



Verification report: ITL2402910

EYECON ALDERNEY LIMITED

Fluffy Arcade: Ring Toss LuckyTap

Certification Report

12 November 2024



iTech Labs is accredited for compliance with ISO/IEC 17025 – Testing and ISO/IEC 17020.

NATA is a signatory to the ILAC Mutual Recognition Arrangement for the mutual recognition of the equivalence of testing and inspection.

Accreditation number: 15690

Links for scope of accreditation: [ISO/IEC 17025](#) and [ISO/IEC 17020](#)

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This test report is valid only for the intended jurisdiction as stated in this report and has no legal value in any other jurisdiction



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I. General information

No.	Description	Details								
1.	Identification	Fluffy Arcade: Ring Toss LuckyTap								
2.	Verification body issuing the certificate (test house)	iTech Labs Suite 24, 40 Montclair Ave Glen Waverley, VIC 3150, Australia URL: www.itechlabs.com E-mail: info@itechlabs.com Registration No: GRSGS1216492								
3.	Guidelines used for testing	Registrar’s Standards for Internet Gaming 2023-04-04								
4.	Target jurisdiction	AGCO								
5.	Details of the module tested	<table><tr><th>No.</th><th>Game Name</th><th>Game Type</th><th>Channel</th></tr><tr><td>1.</td><td>Fluffy Arcade: Ring Toss LuckyTap</td><td>Instant</td><td>HTML5 (Desktop & Mobile)</td></tr></table>	No.	Game Name	Game Type	Channel	1.	Fluffy Arcade: Ring Toss LuckyTap	Instant	HTML5 (Desktop & Mobile)
No.	Game Name	Game Type	Channel							
1.	Fluffy Arcade: Ring Toss LuckyTap	Instant	HTML5 (Desktop & Mobile)							
6.	Type of the module tested	Casino Games								
7.	Produced by	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL Contact: Helen Ackrill (helen.ackrill@ackrill.gg)								
8.	Licensee details	Not applicable								
9.	Date of request for verification	11 October 2024								
10.	Date of completion	12 November 2024								
11.	Platform supplier	Testing was conducted on the test environment provided by EYECON ALDERNEY LIMITED								
12.	Platform version	Testing was conducted on the test environment provided by EYECON ALDERNEY LIMITED Version: GS 3.18.1								
13.	RNG used for testing	EYECON ALDERNEY LIMITED Random Number Generator (RNG) version: 2.0.0 Report REF: ITL2401051_RNG_AGCO_Eyecon_04Jul24								
14.	Results	Passed all tests, except as specified in sections V, VI, and VII								
15.	Other records	Fluffy Arcade: Ring Toss LuckyTap has not been previously certified for AGCO. Testing was conducted on the following devices: <ul style="list-style-type: none">• iPhone XS Max (Browser: Safari)• iPad Mini 4 (Browser: Safari)• Samsung Galaxy S20 (Browser: Chrome)• Samsung Galaxy Tab 4 (Browser: Chrome)								



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II. Details of hardware

No.	Description	Details
1.	Produced by	Not applicable
2.	Identification of hardware	Not applicable
3.	Features that characterize the hardware	Not applicable
4.	Reference to verification	Not applicable
5.	Other records	Not applicable

III. Details of software components

No.	Description	Details																								
1.	Produced by	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL Contact: Helen Ackrill (helen.ackrill@ackrill.gg)																								
2.	Details of the software components	<table border="1"> <thead> <tr> <th>Game Name</th><th>Release</th><th>Build</th></tr> </thead> <tbody> <tr> <td>Fluffy Arcade: Ring Toss LuckyTap</td><td>1.0.2</td><td>5.16.1</td></tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Game Name</th><th>RTP Model</th><th>File Name</th></tr> </thead> <tbody> <tr> <td rowspan="13">Fluffy Arcade: Ring Toss LuckyTap</td><td rowspan="13">93%</td><td>carbine-game-engine-5.16.1-sources.jar</td></tr> <tr><td>CarbineGame.java</td></tr> <tr><td>EvaluationChain.java</td></tr> <tr><td>RngSequences.java</td></tr> <tr><td>BonusWin.java</td></tr> <tr><td>LuckyTap.java</td></tr> <tr><td>LuckyTapAudit.java</td></tr> <tr><td>LuckyTapRulesImpl.java</td></tr> <tr><td>PaytableValue.java</td></tr> <tr><td>CarbineGameComponent.java</td></tr> <tr><td>LuckyTapState.java</td></tr> <tr><td>carbine-luckyTap_fluffyArcadeRingToss_93_standard-1.0.1-config.jar</td></tr> <tr><td>carbine-luckyTap_fluffyArcadeRingToss_93_standard-1.0.1.json</td></tr> </tbody> </table>	Game Name	Release	Build	Fluffy Arcade: Ring Toss LuckyTap	1.0.2	5.16.1	Game Name	RTP Model	File Name	Fluffy Arcade: Ring Toss LuckyTap	93%	carbine-game-engine-5.16.1-sources.jar	CarbineGame.java	EvaluationChain.java	RngSequences.java	BonusWin.java	LuckyTap.java	LuckyTapAudit.java	LuckyTapRulesImpl.java	PaytableValue.java	CarbineGameComponent.java	LuckyTapState.java	carbine-luckyTap_fluffyArcadeRingToss_93_standard-1.0.1-config.jar	carbine-luckyTap_fluffyArcadeRingToss_93_standard-1.0.1.json
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3.	Features that characterise the software object	See at the end of this table ¹																								



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4.	List of software executables and digital signatures (SHA-1)	See at the end of this table ²
5.	Any % RTP	See at the end of this table ³
6.	Reference to verification	Registrar's Standards for Internet Gaming 2023-04-04
7.	Other Records	None

¹ Features that characterize the software object

No.	Game Name	Game Type	Game Description	Min Bet*	Max Bet*
1.	Fluffy Arcade: Ring Toss LuckyTap	Instant	Fluffy Arcade: Ring Toss LuckyTap is an instant game that randomly awards prizes from 3 to 18 with random multipliers. Also, the game has a Free Games feature with retriggers.	\$ 0.06	\$ 120.00

* Verified on the test environment; may vary on production depending on the operator's configurations.

² List of software executables and digital signatures (SHA-1)

Game Name	RTP Model	File Name	SHA-1
Fluffy Arcade: Ring Toss LuckyTap	93%	carbine-game-engine-5.16.1.jar	c22ec0a25565d517d2f9d9094e78988885073dd5
		CarbineGame.class	da33d123332de7a3da26909f5c8d04cbeeb6086e
		EvaluationChain.class	bc534352cc4bdb9c12ffbe493b67abf308ceed18
		RngSequences.class	ead214c3dd4974c3c5b9b6a975eca7323d9524e4
		BonusWin.class	1a437c336580b4b2cdfbfba9b18317185d073f6b
		LuckyTap.class	6168d294218b3627f92f8b5ab1bd669eec7135b8
		LuckyTapAudit.class	c11d0e100b76855bc3506ecee7aa733b78d9cd10
		LuckyTapRulesImpl.class	99f030aeca7e0d26caeb9802f90c1d0cdac0ec1c
		PaytableValue.class	d648d77e21e9472a2973c9f4b484a3fa11f2ae19
		CarbineGameComponent.class	cdeaf4f09bb87fbc8e9b3411edce29714d04540
		LuckyTapState.class	77966912b145422f884dc8f470a2c0c3e215c1f9
		carbine-luckyTap_fluffyArcadeRingToss_93_standard-1.0.1-config.jar	ca6fdf55e3c2b69e4cbb43a3dad218d9fba7ed2f
		carbine-luckyTap_fluffyArcadeRingToss_93_standard-1.0.1.json	097bfc59981c8c5b532157e3a4ffb53800f6af6a



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³ RTP for the game

No.	Game Name	RTP Model	Theoretical RTP
1.	Fluffy Arcade: Ring Toss LuckyTap	93%	93.191%

IV. Details of tests

Product identification: Fluffy Arcade: Ring Toss LuckyTap

No.	Tests Performed	Details of Tests	Results
HTML5 PC			
1.	Game rules & artwork evaluation	Evaluation of game rules and artwork was conducted to ensure that they satisfy relevant requirements in Registrar's Standards for Internet Gaming 2023-04-04 and the game does work according to the game rules and artwork.	Passed
2.	Functional tests	Functional tests were conducted to verify that the game satisfies the relevant requirements in Registrar's Standards for Internet Gaming 2023-04-04.	Passed
3.	Theoretical RTP	Theoretical RTP verification was conducted for the game. See section III.5 above.	Passed
4.	Emulation tests	Emulation tests were conducted to verify that the game payouts are in accordance with the payable and maths.	Passed
5.	Source code review	Source code examination was performed on critical components of the software to ensure that the game complies with the relevant standards and that there are no unintended functionalities.	Passed
HTML5 Mobile			
6.	Game rules & artwork evaluation (as required for mobile-specific components)	Evaluation of game rules and artwork was conducted for mobile-specific components to ensure that they satisfy relevant requirements in Registrar's Standards for Internet Gaming 2023-04-04 and the game does work according to the game rules and artwork.	Passed
7.	Functional tests (as required for mobile-specific components)	Functional tests were conducted to verify that the mobile-specific components satisfy the relevant requirements in Registrar's Standards for Internet Gaming 2023-04-04.	Passed
8.	Regression tests	Regression tests were conducted to verify gameplay, accuracy of balance update, game history, and to verify that the mobile version of the game is the same as the PC version.	Passed
9.	Paytable verification	Paytable verification was conducted to verify that the game payouts are in accordance with the payable.	Passed
10.	Source code review	Source code examination was performed to verify that the PC and mobile versions of the game share the same source code.	Passed
Other			
11.	Other records	Fluffy Arcade: Ring Toss LuckyTap has not been previously certified for AGCO.	Not applicable



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		Testing was conducted on the following devices: <ul style="list-style-type: none"> • iPhone XS Max (Browser: Safari) • iPad Mini 4 (Browser: Safari) • Samsung Galaxy S20 (Browser: Chrome) • Samsung Galaxy Tab 4 (Browser: Chrome) 	
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Note: Evaluation was conducted at iTech Labs facilities in Australia, and India. All functional tests were conducted remotely (i.e. remote test environment hosted on the customer's site).

V. Complete requirements met by the tests

iTech Labs has evaluated Fluffy Arcade: Ring Toss LuckyTap as per the relevant Registrar's Standards for Internet Gaming 2023-04-04. Evaluation details are given below:

DESCRIPTION	REF	RESULT
Game Design and Features		
Game designs and features shall be clear and shall not mislead the player. This standard does not apply to sport and event betting products. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:	AGCO 2.15	
1. Game design shall not give the player the perception that speed of play or skill affects the outcome of the game when it does not.	AGCO 2.15 - 1	Operator responsibility*
2. After the selection of game outcome, the game shall not make a variable secondary decision which affects the result shown to the player. If the outcome is chosen that the game will lose then the game shall not substitute a particular type of loss to show to the player (i.e. near miss).	AGCO 2.15 - 2	Comply
3. Where the game requires a pre-determined pattern (for example, hidden prizes on a map), the locations of the winning spots shall not change during play, except as provided for in the terms governing play.	AGCO 2.15 - 3	Not applicable
4. Games shall not display amounts or symbols that are unachievable.	AGCO 2.15 - 4	Comply
5. Free-to-play games available through the gaming site or related websites shall not misrepresent or mislead players as to the likelihood of winning or prize distribution of similar games, and shall have the same odds of winning as games played for money.	AGCO 2.15 - 5	Comply
6. The denomination of each credit shall be clearly displayed on game screens.	AGCO 2.15 - 6	Comply
The method of making bets in sport and event betting must be straightforward and understandable. Information must be made available so that the player is clearly informed of the details of the bet prior to making the bet. All selections in a bet must be displayed to the player. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:	AGCO 2.15.1	
1. Bets on multiple events (parlays) must be identified as parlays.	AGCO 2.15.1 - 1	Not applicable
2. The player must be informed that a bet selected by the player has or has not been accepted.	AGCO 2.15.1 - 2	Not applicable



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DESCRIPTION	REF	RESULT
3. Where the player has placed a bet and the odds, payout odds, or prices of the bet change prior to the bet being confirmed by the operator, the player must have the option of confirming or withdrawing the bet (with refund of the bet). This requirement may not apply to an option for automatic acceptance of changes in bets described in Requirement 4 below.	AGCO 2.15.1 - 3	Not applicable
4. Where operators offer an option of automatic acceptance of changes in bets offered, the player must manually opt in to activate this functionality and must be able to opt out at any time. The details of this auto-accept function and any options for the function must be clearly explained to the player prior to their consent to the application of the function.	AGCO 2.15.1 - 4	Not applicable
5. The player must be informed of the period in which bets can be made on an event or series of events and bets cannot be placed after the close of the betting period.	AGCO 2.15.1 - 5	Not applicable
6. Free to play sport and event betting games must not mislead players about the odds, payouts or any element of a bet for value available in sport and event betting.	AGCO 2.15.1 - 6	Not applicable
7. All bets and payouts must be expressed in Canadian currency.	AGCO 2.15.1 - 7	Not applicable
Players must be able to access information regarding available sport and event bets without having to place a bet. This information includes. Requirements — At a minimum:	AGCO 2.15.2	
1. Information on the bets available;	AGCO 2.15.2 - 1	Not applicable
2. Odds, payouts and prices for available bets;	AGCO 2.15.2 - 2	Not applicable
3. In a dynamic betting environment, including those where individuals' wagers are gathered into pools: a. The most up-to-date odds and payouts; The up-to-date total value of the pool for market pools and pool bets that are offered.	AGCO 2.15.2 - 3	Not applicable
Reputable and legitimate data source(s) must be used to determine the outcome of a bet. These data source(s) shall be made available to the player upon request. (Also applicable to Gaming-Related Suppliers)	AGCO 2.15.3	Not applicable
Game designs and features shall help to prevent extended, continuous and impulsive play and facilitate low risk play behaviours. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:	AGCO 2.16	
1. Games shall not encourage players to chase their losses, or increase the amount they have decided to gamble, or continue to gamble after they have indicated that they want to stop.	AGCO 2.16 – 1	Comply
2. Games shall not provide auto-play features for slots.	AGCO 2.16 - 2	Comply
3. Game play shall be initiated only after the player has placed a wager and activated play. No player shall be forced into game play by selecting the game for review or reviewing information about how the game is played or how bets are made.	AGCO 2.16 - 3	Comply

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DESCRIPTION	REF	RESULT
4. A player should commit to each game individually, releasing and then depressing the 'start button' or taking equivalent action. Continued contact with a button, key or screen should not initiate a new game.	AGCO 2.16 - 4	Comply
The gaming system must not offer functionality which facilitates playing multiple slots games at the same time. This includes, but is not limited to, split screen or multi-screen functionality. (Also applicable to Gaming-Related Suppliers) Combining multiple slots titles in a way which facilitates simultaneous play is not permitted.	AGCO 2.17	Not applicable
It must be a minimum of 2.5 seconds from the time a game is started until the next game cycle can be commenced. It must always be necessary to release and then depress the 'start button' or take equivalent action to commence a game cycle. (Also applicable to Gaming-Related Suppliers) A game cycle starts when a player depresses the 'start button' or takes equivalent action to initiate the game and ends when all money or money's worth staked or won during the game has been either lost or delivered to, or made available for collection by the player and the start button or equivalent becomes available to initiate the next game. A player should commit to each game cycle individually, continued contact with a button, key or screen should not initiate a new game cycle.	AGCO 2.18	Not applicable
For slots games, the gaming system must not permit a customer to reduce the time until the result is presented. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:	AGCO 2.19	
1. Features such as turbo, quick spin and slam stop are not permitted. This is not intended to be an exhaustive list but to illustrate the types of features the requirement is referring to. <i>Note: This Standard does not apply to bonus/feature games where an additional stake is not wagered.</i>	AGCO 2.19 - 1	Not applicable
For slot games, the gaming system must not use auditory or visual effects that are associated with a win for returns which are less than or equal to last total amount wagered. (Also applicable to Gaming-Related Suppliers)	AGCO 2.20	Not applicable
For slot games, all gaming sessions must clearly display a customer's net position (the total of all winnings minus the sum of all losses since the start of the session), in Canadian dollars. (Also applicable to Gaming-Related Suppliers)	AGCO 2.21	Not applicable
Players shall have the means to track the passage of time. (Also applicable to Gaming-Related Suppliers)	AGCO 2.22	Comply
Information about player account transactions shall be made readily available and clear to the player. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum, the gaming system shall give the player access to the following information:	AGCO 3.15	
3. Date and time of previous login.	AGCO 3.15 - 3	Operator responsibility*



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DESCRIPTION	REF	RESULT
4. Gaming event and transaction history (game session outcomes and game transactions) including, in sport and event betting, the date and time of past and current bets, and the date and time at which past bets were settled, and information about current bets.	AGCO 3.15 - 4	Operator responsibility*
5. Total monies wagered for session and/or period of time.	AGCO 3.15 - 5	Operator responsibility*
6. Total monies won or lost for session and/or period of time.	AGCO 3.15 - 6	Operator responsibility*
7. Account balance at start and end of session.	AGCO 3.15 - 7	Operator responsibility*
Game Integrity		
All gaming activities and financial transactions shall be conducted fairly and honestly, and must be independently verifiable. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:	AGCO 4.01	
1. Continuous independent monitoring and recording of lottery schemes and cash (and cash equivalent) handling must be in place to support the verification of: a. Adherence to required game rules by players and employees or, in sport and event betting, the processing and redemption, if any, of the bet fairly, honestly and in accordance with the terms of the bet placed by the player, including applicable betting rules; b. Confirmation of outcomes of lottery schemes; c. Prize payment to the proper person; d. Accuracy of financial transactions.	AGCO 4.01 – 1	Operator responsibility*
2. Continuous logs shall be maintained for critical gaming systems including to track financial accounting and game state history.	AGCO 4.01 – 2	Operator responsibility*
There shall be appropriate, accurate and complete records of transaction and game state and play information kept and made available for the purposes of (Also applicable to Gaming-Related Suppliers):	AGCO 4.02	
Guidance: There should be an adequate amount of storage, capacity and retention of logged information. The appropriate capacity, design and monitoring of the logging facilities should be in place to ensure that logging is not interrupted for a technical reason that could have been prevented.		
1. Ensuring timely investigations can be performed by the Registrar.	AGCO 4.02 - 1	Operator responsibility*
2. Capturing information needed to continue a partially complete game within a reasonably defined time.	AGCO 4.02 - 2	Operator responsibility*
3. Resolving disputes in a fair and timely manner.	AGCO 4.02 - 3	Operator responsibility*
4. Ensuring player complaints can be resolved.	AGCO 4.02 - 4	Operator responsibility*
5. Tracking all relevant player information (including funds information).	AGCO 4.02 - 5	Operator responsibility*
6. Tracking all relevant individual gaming sessions and game play information.	AGCO 4.02 - 6	Operator responsibility*



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DESCRIPTION	REF	RESULT
7. Tracking all relevant information related to events (including significant events).	AGCO 4.02 - 7	Operator responsibility*
8. Tracking of game enabling, disabling and configuration changes.	AGCO 4.02 - 8	Operator responsibility*
There shall be a mechanism in place to ensure that if logging is interrupted, compensating manual controls are used, where reasonable. (Also applicable to Gaming-Related Suppliers)	AGCO 4.03	Operator responsibility*
The gaming system shall be capable of providing custom and on-demand reports to the Registrar. (Also applicable to Gaming-Related Suppliers) Guidance: the intent is to ensure that the Registrar can receive information in an appropriate format when necessary. Examples are: a list of all games hosted by the website, or a list of all active player accounts.	AGCO 4.04	Operator responsibility*
Game specifications must be documented that clearly indicate (Also applicable to Gaming-Related Suppliers):	AGCO 4.05	
1. The objectives of the game;	AGCO 4.05.1	Comply
2. The wagers that may be made;	AGCO 4.05.2	Comply
3. How the game is operated and played;	AGCO 4.05.3	Comply
4. Odds of winning for each prize available to players;	AGCO 4.05.4	Comply
5. The advantage of the operator in relation to each wager.	AGCO 4.05.5	Comply
Prior to placing a bet or wager, the player shall be provided with sufficient information to make informed decisions about betting or wagering based on chances of winning, the way the game is played, and prizes and payouts are made. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:	AGCO 4.06	
1. Comprehensive and accurate information that explains the applicable terms governing play must be easily available to the player prior to the placing of a bet or wager through such supports as “game rules”, “help” or “how to play” pages placed prominently to allow players to easily locate them. All reasonable steps must be taken to ensure the content is understandable.	AGCO 4.06 - 1	Comply
2. The explanatory content shall: a. indicate the methods of how players may participate in the game and provide instructions and any terms for each of these methods, b. provide clear instructions on how to interact with the game, c. provide clear descriptions of what constitutes a winning outcome, d. indicate any restrictions on play or betting (e.g., play duration limits, maximum wins), e. contain comprehensive, accurate and understandable information on the odds of winning, payout odds, or returns to players, f. indicate prize value units (e.g., currency or credits), g. provide any other information on elements that will affect play (e.g., the number of decks or frequency of shuffles in virtual card games, the method of in-gaming betting) or results (e.g., how progressive jackpots work, number and kind of tokens to be collected to enter a bonus round, the rules and behaviour in a bonus round, how the results of	AGCO 4.06 - 2	Comply

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DESCRIPTION	REF	RESULT
pool betting in sport and event betting work, the procedures for confirming the results), h. contain the same information and be consistent across all languages it is provided in.		
3. If certain outcomes, prizes or features are only available under limited circumstances, the explanatory content must clearly indicate what these circumstances are.	AGCO 4.06 - 3	Not Applicable
4. Where speed of interaction has an effect on the player's chances of winning, players must be informed that the speed of connection or processor may have an effect on the game.	AGCO 4.06 - 4	Not Applicable
5. Where player skill and/or strategy has an impact on the player's chances of winning, players must be informed that their skill and/or strategy will have an impact on their chances of winning.	AGCO 4.06 - 5	Not Applicable
6. For all peer-to-peer games, players must be informed of possible communication loss and the impact to the player in such an event.	AGCO 4.06 - 6	Not Applicable
7 The denomination of each credit shall be clearly displayed.	AGCO 4.06 - 7	Comply
8. The units of displayed prizes and payouts (e.g. denominational units, currency) must be clear.	AGCO 4.06 - 8	Comply
9. Cash out options and how to redeem winning bets in sport and event betting.	AGCO 4.06 - 9	Not Applicable
10. Players shall be provided with information that indicates circumstances in which a game can be declared void.	AGCO 4.06 - 10	Comply
Information provided to players prior to and during game play shall not mislead players or misrepresent games. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum, information shall not:	AGCO 4.07	
1. Describe any outcomes, prizes, or features that are not achievable.	AGCO 4.07 - 1	Comply
2. Encourage play as a means of recovering past gambling or other financial losses.	AGCO 4.07 - 2	Comply
3. Be designed so as to make false promises or present winning as the probable outcome.	AGCO 4.07 - 3	Comply
4. Imply that chances of winning increase: a. The longer one plays; b. The more one spends; or c. Suggest that skill can influence the outcome (for games where skill is not a factor);	AGCO 4.07 - 4	Not Applicable
5. Use language that suggests the probability of a particular outcome is more likely to occur than its actual probability. Examples include the use of the terms, "due", "overdue", "ready", and "ready to hit".	AGCO 4.07 - 5	Comply
6. Mischaracterize the nature of the game by giving it a commonly accepted name, such as "European Roulette", if the game does not operate as a player would reasonably expect.	AGCO 4.07 - 6	Not Applicable
All igaming games, random number generators and components of igaming systems that accept, process, determine outcome of, display, and log details about player bets, including any subsequent modifications, must either be approved by the Registrar or certified by an independent testing laboratory registered by the Registrar, as per	AGCO 4.08	Operator responsibility*



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DESCRIPTION	REF	RESULT
the AGCO's <i>ITL Certification Policy</i> , prior to being provided for any gaming site.		
Gaming systems and gaming supplies shall be provided, installed, configured, maintained, repaired, stored, and operated in a way that ensures the integrity, safety and security of the gaming supplies and systems. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:	AGCO 4.09	
1. Only games and remote gaming servers approved by the Registrar or certified by an independent testing laboratory registered by the Registrar shall be used on the gaming site.	AGCO 4.09 - 1	Operator responsibility*
5. Operators shall monitor the payback of their live games to detect any behaviour that may indicate faulty performance.	AGCO 4.09 - 5	Operator responsibility*
Where there are suspected game or system faults that may impact game integrity or fairness including the integrity or fairness of sport and event betting(e.g., influencing a player's chances of winning or the return to players), Operators shall make the game unavailable to players until the issue has been resolved. In the case of sport and event betting, making a game unavailable may include the suspension of betting, the withholding of funds, and the refund of any bet until a gaming system fault has been resolved. Operator decisions must be fair, reasonable, and made in good faith.	AGCO 4.10	Operator responsibility*
Game outcomes and sport and event betting transactions shall be recoverable, where technically possible, so that player bets can be settled appropriately. (Also applicable to Gaming-Related Suppliers)	AGCO 4.12	Operator responsibility*
In any case where there is a game or system fault, including where game outcomes or sport and event betting transactions are not recoverable, the Operator shall have clearly defined policies and processes in respect of treating the player fairly when resolving the player's transactions. These policies and processes shall be made available to players. (Also applicable to Gaming-Related Suppliers)	AGCO 4.13	Operator responsibility*
Mechanisms shall be in place to allow a game to be recreated up to and including the last communicated state to the player. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:	AGCO 4.14	
1. Selected electronic game elements and game outcomes shall be logged before they are displayed to the player.	AGCO 4.14 - 1	Operator responsibility*
2. Information shall be captured that is needed to continue a partially complete game within a reasonable period of time.	AGCO 4.14 - 2	Operator responsibility*
A player's bet and the outcome of the game shall be clearly displayed, easy to understand, and available for a sufficient length of time for the player to review. (Also applicable to Gaming Related Suppliers)	AGCO 4.15	Comply
Games shall pay out accurately, completely and within a reasonable time of winning, subject to checks and verifications. (Also applicable to Gaming-Related Suppliers)	AGCO 4.16	Comply
Collusion and Cheating		



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DESCRIPTION	REF	RESULT
Operators shall have mechanisms in place to appropriately deter, prevent and detect collusion and cheating.	AGCO 4.17	Not Applicable
All relevant activities related to the detection of collusion and cheating shall be logged.	AGCO 4.18	Not Applicable
Players shall be provided with clear information on the process to report activities related to collusion and cheating, including the suspected use of bots. The process must be simple to use and readily accessible to a player seeking to make a report. Requirements – At a minimum:	AGCO 4.19	
1. Complaints by players about unfair treatment, cheating and collusion must be investigated.	AGCO 4.19 - 1	Not Applicable
2. Information about the Operator's policies and procedures to deter, prevent and detect unfair behaviour, cheating and collusion, including the suspension or disabling of accounts and any recovery of funds, must be made available to the public on request.	AGCO 4.19 - 2	Not Applicable
3. Where an investigation, whether initiated by the Operator or as a result of a player complaint, results in the suspension or disabling of a player account, records of the investigation identifying the activities, the reason for the investigation (including whether it was initiated as the result of a player complaint) and any relevant evidence should be retained in accordance with Standard 1.09.	AGCO 4.19 - 3	Not Applicable
4. The Registrar shall be informed, in accordance with the notification matrix, of any incident that an Operator reasonably believes constitutes an incident of intentional cheating while playing a lottery scheme.	AGCO 4.19 - 4	Not Applicable
Speed and Interruption		
Where speed of interaction has an effect on the player's chances of winning, the Operator shall take reasonable steps to ensure the player is not unfairly disadvantaged due to gaming system related performance issues.	AGCO 4.20	Not Applicable
Service interruptions shall be responded to and dealt with in a way that does not disadvantage players. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum, the gaming system shall:	AGCO 4.21	
1. Inform players that the speed of connection or processor may have, or appear to have, an effect on the game;	AGCO 4.21 - 1	Operator responsibility*
2. Recover from failures that cause interruptions to the game in a timely fashion;	AGCO 4.21 - 2	Operator responsibility*
3. Where appropriate, void bets;	AGCO 4.21 - 3	Operator responsibility*
4. Retain sufficient information to be able to restore events to their pre-failure state, if possible;	AGCO 4.21 - 4	Operator responsibility*
5. Pay players the amount won up to that point, or return bets to players where a game cannot be continued after a service interruption, whichever is the better outcome for the player.	AGCO 4.21 - 5	Operator responsibility*
Peer-to-Peer Games		

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DESCRIPTION	REF	RESULT
In peer-to-peer games, Operators must implement measures intended to deter, prevent and detect the use by players of software programs to automatically participate in game play (referred to as a bot) or to provide the player with an unfair advantage over other players. Requirements – At a minimum:	AGCO 4.22	
1. Operators must clearly provide notice to players of peer-to-peer games that the use of such software is not permitted and, if a player is found to have used such software, it will be considered to be cheating and the player may be sanctioned by the Operator accordingly.	AGCO 4.22 - 1	Not applicable
Games must be conducted in a manner that ensures players are treated fairly and not unfairly disadvantaged by other players. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:	AGCO 4.23	
1. Measures intended to deter, prevent, and detect unfair behaviour, collusion and cheating, including the suspected use of bots, must be implemented.	AGCO 4.23 - 1	Not applicable
2. Information regarding specific game elements (such as a player's hand or cards) shall not be accessible to give advantage to any player during games, unless by the player themselves.	AGCO 4.23 - 2	Not applicable
3. A mechanism shall be in place to ensure that a player cannot play against themselves or occupy more than one seat at an individual table.	AGCO 4.23 - 3	Not applicable
4. Gaming systems must retain a record of relevant activities to facilitate investigation and be capable of suspending or disabling player accounts and player sessions.	AGCO 4.23 - 4	Not applicable
5. Operators must monitor the effectiveness of their policies and procedures.	AGCO 4.23 - 5	Not applicable
6. As a minimum deterrent, players must be informed that accounts may be closed if the player has cheated, colluded or acted unfairly towards another player.	AGCO 4.23 - 6	Not applicable
Determination of Game Outcomes		
Games must operate according to their game specifications and the outcomes must be determined in accordance with the terms governing play and prevailing payouts as they are described to the player. Sport and event betting must be conducted fairly, honestly and in accordance with the terms of the bet placed by the player. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:	AGCO 4.24	
1. All possible game outcomes (winning and losing outcomes) shall be available in each play, unless clearly explained to the player.	AGCO 4.24 - 1	Comply
2. The probability of game outcomes in virtual games shall be the same as in the associated live game (e.g., card games), unless the differences are set out in the terms governing play and communicated to players.	AGCO 4.24 - 2	Not applicable
3. The probability of achieving a specific game outcome shall be constant and independent of game history, player or any other factor, unless clearly explained in the terms governing play. Where the game	AGCO 4.24 - 3	Not Applicable

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DESCRIPTION	REF	RESULT
outcome is intended to be random (e.g., dice games or slot games), the outcome must not be dependent or based upon any history or other factors.		
4. Sport and event bets shall be accepted, processed, and settled in accordance with the terms of the bet placed by the player, including any applicable betting rules.	AGCO 4.24 - 4	Not applicable
Bets shall be committed before the determination of game outcomes. Any wager received after the determination of game outcomes associated with the wager shall be voided and returned to the player. (Also applicable to Gaming-Related Suppliers)	AGCO 4.25	Operator responsibility*
In sport and event betting, bets must be settled fairly and in accordance with the terms of the bet placed by the player and any applicable betting rules that were available to the player when the bet was placed. Where raised, the reasons for the settlement must be clearly and promptly provided to the player. (Also applicable to Gaming-Related Suppliers)	AGCO 4.25.1	Operator responsibility*
The results of bets on sporting or other events must be provided to players making bets on the events. Any change of results must be made available. Account balances will be updated as the results of wagers are confirmed. (Also applicable to Gaming-Related Suppliers)	AGCO 4.25.2	Operator responsibility*
Sport and event betting operators shall have controls in place to ensure the accuracy and timeliness of sport and event results data. (Also applicable to Gaming Related Suppliers)	AGCO 4.25.3	Operator responsibility*
Randomness of Game Outcomes		
A mechanism shall be in place to randomly select game elements used to determine game outcomes. This standard does not apply to sport and event betting products. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:	AGCO 4.26	
1. Initial values and conditions shall be selected and used to seed the random selection process in a way that ensures the randomness of the resulting game outcomes and avoids any correlation of selected game elements with elements selected by any other instances of the mechanism.	AGCO 4.26 - 1	Covered by a separate RNG certification (REF: ITL2203053)
2. The selected game elements and their associated game outcomes shall not be influenced, affected or controlled by the amount wagered, or by the style or method of play unless the conditions are changed and are disclosed clearly to the player.	AGCO 4.26 - 2	Covered by a separate RNG certification (REF: ITL2203053)
3. The mechanism used to select game elements and their associated game outcomes shall be impervious to outside influences (such as electro-magnetic interference, devices within or external to the gaming system; the characteristics of the communication channel between the system and the end player device, the player or the Operator) and its components shall not be subject to deterioration that impacts, before any scheduled replacement lifecycle, the randomness of selection.	AGCO 4.26 - 3	Covered by a separate RNG certification (REF: ITL2203053)



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DESCRIPTION	REF	RESULT
4. The selected game elements and their associated game outcomes shall not be altered, discarded or otherwise manipulated through a secondary decision by the game program and shall not be impacted by load on the gaming system.	AGCO 4.26 - 4	Covered by a separate RNG certification (REF: ITL2203053)
5. Any failure by the mechanism to randomly select game elements, including an interruption in the selection process, must be identified and responded to quickly and appropriately to minimize the effect on players.	AGCO 4.26 - 5	Covered by a separate RNG certification (REF: ITL2203053)
Mechanisms used to select game elements and their associated game outcome must be capable of being monitored and inspected to ensure the integrity of the mechanisms and its component devices and the randomness of the generated outcomes. This standard does not apply to sport and event betting products. (Also applicable to Gaming-Related Suppliers)	AGCO 4.27	Covered by a separate RNG certification (REF: ITL2203053)
Game Management		
Terms governing play must not be changed during a game session unless the player is made aware of the change before the player places any wagers in the game. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:	AGCO 4.28	
1. Where applicable, game interface changes made by the player shall be appropriately limited by the gaming system to ensure that information and representation of the game remains fair and accurate and in accordance with the terms governing play.	AGCO 4.28 - 1	Comply
2. Information on the current state of multi-state games must be clearly displayed,	AGCO 4.28 - 2	Not applicable
3. Displays of jackpot amounts that change over time should be updated as frequently as practicable and particularly after the amount has been reset after a win.	AGCO 4.28 - 3	Not applicable
4. Odds in sport and event betting sometimes change prior to or during an event. Changes in odds must be updated and publicly available to all players. This is not intended to entitle a player who has previously placed a bet to receive new odds on that bet.	AGCO 4.28 - 4	Not applicable
Game sessions must be appropriately secured and checked for authenticity. (Also applicable to Gaming-Related Suppliers)	AGCO 4.29	Operator responsibility*
There shall be a player activity time-out that automatically logs the player out or ends the player's session after a specified period of inactivity. (Also applicable to Gaming-Related Suppliers)	AGCO 4.30	Operator responsibility*
Downloadable Game Content		
All critical functions, including the generation of the outcome of any game, shall be generated by the gaming system, independent of the end player device. Guidance: <i>The intent is for the Operator to maintain control (i.e., security, integrity) of all critical game functions.</i>	AGCO 4.31	Operator responsibility*
Sport and Event Betting Integrity		



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DESCRIPTION	REF	RESULT
Sport and event betting operators shall have risk management measures in place to mitigate the betting integrity risk associated with sport and event betting, including insider betting and event manipulation. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:	AGCO 4.32	
1. Operators shall establish controls to identify unusual or suspicious betting activity and report such activity to an independent integrity monitor. Unusual betting activity is a betting pattern that deviates, including statistically, from the activity otherwise exhibited by patrons and reasonably expected by an operator or independent integrity monitor, which may indicate potential suspicious activity in the betting or the underlying sport or other event. Unusual betting activity may include the size of a patron's wager or increased wagering volume on a particular event or wager type. Suspicious betting activity is unusual betting activity that cannot be explained and is indicative of match fixing, the manipulation of an event, misuse of inside information, or other illicit activity.	AGCO 4.32 - 1	Not applicable
2. Independent integrity monitors shall not have any perceived or real conflicts of interests in performing the independent integrity monitor role, including such as acting as an operator or as an oddsmaker.	AGCO 4.32 - 2	Not applicable
3. Independent integrity monitors shall promptly disseminate reports of unusual betting activity to all member sport betting operators.	AGCO 4.32 - 3	Not applicable
4. All sport and event betting operators shall review such reports and notify their independent integrity monitor of whether they have experienced similar activity.	AGCO 4.32 - 4	Not applicable
5. If an independent integrity monitor finds that previously reported unusual betting activity rises to the level of suspicious activity, they shall immediately notify any entity with which they have an information sharing relationship, including independent integrity monitors, sport betting operators, the appropriate governing authority for the sport or event, and any other organizations or individuals identified by the Registrar.	AGCO 4.32 - 5	Not applicable
6. All independent integrity monitors receiving such a report shall share such report with their member sport betting operators.	AGCO 4.32 - 6	Not applicable
7. Independent integrity monitors shall facilitate collaboration and information sharing to enable the investigation of and response to prohibited activity associated with the suspicious betting activity as directed by the Registrar.	AGCO 4.32 - 7	Not applicable
8. Independent integrity monitors shall provide, in accordance with the notification matrix, the Registrar with: <ol style="list-style-type: none"> 1. All reports of unusual betting activity. 2. If the activity was determined to be suspicious; and 3. The actions taken by the independent integrity monitor. 	AGCO 4.32 - 8	Not applicable
Guidance: The Registrar will publish a list of registered independent integrity monitors.	AGCO 4.32 - 8	



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DESCRIPTION	REF	RESULT
An operator receiving a report of suspicious activity under Standard 4.32 may suspend or cancel sport and event betting on events related to the report or withhold associated customer funds. To this end, an Operator must ensure that it has reserved itself the authority to suspend betting, void bets, and withhold associated customer funds. The Operator's decision to suspend or cancel sport and event betting, or withhold associated customer funds, on events related to the report must be fair, reasonable, and made in good faith.	AGCO 4.33	Not applicable
Operators offering sport and event betting products shall ensure that all bets offered meet the following criteria:	AGCO 4.34	Not applicable
1. The outcome of the event being bet on can be documented and verified;	AGCO 4.34 - 1	Not applicable
2. The outcome of the event being bet on can be generated by a reliable and independent process;	AGCO 4.34 - 2	Not applicable
3. The outcome of the event being bet on is not affected by any bet placed;	AGCO 4.34 - 3	Not applicable
4. The majority of participants in the event or league are 18 years of age or older, event shall be broadly defined as assessing total participants in the event/league, rather than in a particular heat, game, match or final contest in the overall sporting event;	AGCO 4.34 - 4	Not applicable
5. For sporting events being bet on the event must be effectively supervised by a sport governing body which must, at minimum prescribe final rules and enforces codes of conduct that include prohibitions on betting by insiders (not applicable to novelty bets);	AGCO 4.34 - 5	Not applicable
6. There are integrity safeguards in place which are sufficient to mitigate the risk of match fixing, cheat-at-play, and other illicit activity that might influence the outcome of bet upon events;	AGCO 4.34 - 6	Not applicable
7. The bet is not on a past event for which the outcome is publicly known;	AGCO 4.34 - 7	Not applicable
8. The bet is not reasonably objectionable,	AGCO 4.34 - 8	Not applicable
9. The event being bet on does not involve animal fighting or cruelty,	AGCO 4.34 - 9	Not applicable
10. Bets on assets and financial markets (e.g., stocks, bonds, currencies, real property) are prohibited;	AGCO 4.34 - 10	Not applicable
11. Bets which expose players to losses greater than the amount wagered are prohibited,	AGCO 4.34 - 11	Not applicable
12. Bets which mimic the structure of financial instruments, products, or markets are prohibited.	AGCO 4.34 - 12	Not applicable
13. Bets on synthetic lottery products and bets on lottery outcomes are prohibited;	AGCO 4.34 - 13	Not applicable
14. The event being bet on is conducted in conformity with all applicable laws;	AGCO 4.34 - 14	Not applicable
15. Bets on minor league sports in Canada, including the Canadian Hockey League (CHL), are prohibited	AGCO 4.34 - 15	Not applicable
Live Dealer Game Integrity	AGCO 4.35	



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DESCRIPTION	REF	RESULT
<p>Applicable to systems with live dealer gaming supplies (Also part of the games checklists. If Games and security in scope of the project, only perform once)</p> <p>Access to live dealer gaming supplies shall be restricted to individuals with a business need. (Also applicable to Gaming-Related Suppliers) [Added: October, 2022] Requirements – At a minimum:</p>		
Access privileges are granted, modified, and revoked based on employment status and job requirements and all activities associated with these actions logged.	AGCO 4.35 - 1	Not applicable
Access privileges are independently reviewed and confirmed on a periodic basis.	AGCO 4.35 - 2	Not applicable
<p>Applicable to systems with live dealer gaming supplies (Also part of the games checklists. If Games and security in scope of the project, only perform once)</p> <p>Operators must have controls in place to ensure live dealer game presenters do not compromise the integrity of a game. [Added: October, 2022]</p>	AGCO 4.36	Not applicable
<p>Sensitive data, including player information and data relevant to determining game outcomes, shall be secured and protected from unauthorized access or use at all times. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:</p>	AGCO 5.25	
1. The gaming system shall ensure that data is appropriately backed up in a manner that allows it to be completely and accurately restored.	AGCO 5.25 - 1	Operator responsibility*
2. Data backups shall be stored off-site in a secure location and in accordance with applicable policies and laws.	AGCO 5.25 - 2	Operator responsibility*
Communication of sensitive game data shall be protected for integrity. (Also applicable to Gaming-Related Suppliers)	AGCO 5.27	Operator responsibility*
<p>Guidance: <i>. For the purpose of Req. 8, reasonably objectional bets include bets on events which are unethical, allow entertainment to be derived from human suffering or death or involve non-consensual violence or injury. . Req 12 applies to contracts for difference including spread betting.</i></p>		
<p>No player's account is permitted to have a negative funds balance. A player's account with a negative funds balance must be suspended and no transactions permitted after the negative funds balance arises. No transaction is permitted until the negative funds balance is eliminated. No bet will be accepted that could result in a negative funds balance. Guidance: This Standard is not intended to prohibit the resettlement of bets when reasonable and necessary.</p>	AGCO 5.75	Operator responsibility*
<p>Players shall be provided with a clear and accurate representation of their funds account balance that is easily accessible and readily available at all times. (Also applicable to Gaming-Related Suppliers) Requirements – At a minimum:</p>	AGCO 5.76	
1. The player balance shall be displayed in Canadian dollars.	AGCO 5.76 - 1	Comply



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VI. Observations

None



VII. Conditions

Before the game is released to production, all Operator-responsibility items listed under section **V. Complete requirements met by the tests** above must be satisfied by the Operator.

VIII. Final declaration and conformity

No.	Description	Details
1.	Certification	Date of certification: 12 November 2024 Software provider: EYECON ALDERNEY LIMITED Licensee name: N/A Licensee site URLs: N/A Total number of pages: 20 iTech Labs certifies that Fluffy Arcade: Ring Toss LuckyTap has passed all tests according to the "Registrar's Standards for Internet Gaming 2023-04-04", except as specified in sections V, VI, and VII. iTech Labs recommends that Fluffy Arcade: Ring Toss LuckyTap be approved for deployment, subject to the above.

Signatures:

Authorised by:  <hr/> Eric Sheng Project Manager iTech Labs 12 November 2024	Signed by:  <hr/> Alvin Rizaldi Chief Executive Officer iTech Labs 12 November 2024
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IX. Conclusion

While it is not possible to test all possible scenarios in a laboratory environment, iTech Labs has conducted a level of testing appropriate for a submission of this type.

Accordingly, subject to the above comments, iTech Labs certifies that the items under test comply with the relevant Technical Standards, unless otherwise stated.