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RvA Registration Number of  
Accreditation applicable to this  
Report:

Inspection	I111
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<b>Report Type:</b>	Inspection
<b>Report Date:</b>	17 July 2024
<b>Inspection Body:</b>	GLI Europe BV  GLI Europe B.V. Diakenhuisweg 29-35 2033AP, Haarlem, The Netherlands RvA I111
<b>Evaluating Laboratories:</b>	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3 UL
<b>Report Recipient:</b>	Netherlands Remote
<b>Jurisdiction:</b>	Remote Gambling Assessment Scheme (Remote gambling conformity assessment scheme) Version 2.0
<b>Technical Standard(s) for Inspection:</b>	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).
<b>Supplementary Documentation:</b>	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3 UL
<b>Software Supplier:</b>	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3 UL
<b>Submitting Party/ Licensee Name:</b>	SHA1PRNGAdapter.class as described in the Software Product Details section.
<b>Product Inspected:</b>	As requested per submitter's request received on 06 May 2024.
<b>Request Date:</b>	12 July 2024 / 12 July 2024
<b>Evaluation Period:</b>	RN-246-EYL-24-001-609
<b>Internal Reference:</b>	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:
<b>Inspection Result:</b>	<b>Complies</b>



## Software Product Details

GLI inspected the following RNG:

Game Type	Version
SHA1 PRNG RNG	2.0.0



## Software Product Details

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

File Name	SHA-1 Checksum
SHA1PRNGAdapter.class	53EF6787F3DA368ACE3D0D878FA393EDCEB2FB5F



## RNG Analysis

The RNG Analysis was performed by iTech Labs and the results were documented in report ITL2401434, dated 04 July 2024.

GLI did not perform any analysis, statistical or otherwise, on this RNG as part of the inspection. The Inspection Assessment performed by GLI was based on the report and underlying results provided by iTech Labs in order to confirm compliance with the applicable requirements.

Please reference ITL2401434 for further information on the ranges and results of the statistical analysis.

**Jurisdictional Requirements****Documentation used for the Inspection**

Document N°	Document Title	Version/Date of Issue
1	104 General RNG Checklist ver 10.doc  This is the document containing the results of the source code review and data analysis activities.	03 July 2024
2	ITL2401434_RNG_NL_Eyecon_04Jul24.docx  This is the document containing the results of the source code review and data analysis activities.	03 July 2024
3	Results.rar  This is an archive containing the results of the data analysis.	12 July 2024
4	Supervised_build_17Jun24.docx  This document includes the supervised build activity.	03 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 the Inspected Items table below.

## Jurisdictional Requirements

### Inspected Items

Gambling Technology Article no. (B) Decree or (R) Regulation		Determination	Result/Explanation	Documentation
<b>64</b>  R3.2a.1  ID NL: KS.09.11_2.0	In terms of design and implementation, establish that the Random Number Generator applied is suitable for the form of gambling for which the Random Number Generator is used.	<b>PASS</b>	Result of source code review and/or statistical tests.	Ref 1. 2. 3. 4
	Explanatory note: The Random Number Generator must be suitable to be used for the random parts of the gambling activities. The results of the random aspects of the gambling activities are directly related to the draw by means of a Random Number Generator.			
	Methods Used:	<b>PC-TC-001, WI-FI-009</b>		
	Performed by:	GLI Europe BV		
<b>65</b>  R3.2a.3  ID NL: KS.09.12_2.0	In terms of design and implementation, establish that, for casino games, each Random Number Generator, with a data set of at least 1,000,000 outcomes, successfully passes the below tests: <ul style="list-style-type: none"> <li>the DIEHARD Test (Marsaglia) and;</li> <li>the NIST (National Institute of Standards and Technology);</li> </ul>	<b>PASS</b>	Result of source code review and/or statistical tests.	Ref 1. 2. 3. 4
	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 $6 * 1000 = 6000$ .	<b>N/A</b>	Not a mechanical RNG	N/A
	Methods Used:	<b>PC-TC-001, WI-FI-009</b>		
	Performed by:	GLI Europe BV		
<b>66</b>  R3.2.1  ID NL: KS.09.13_2.0	In terms of design and implementation, establish that each Random Number Generator is equipped with a suitable method of seeding and re-seeding so that predictability of results is avoided.	<b>PASS</b>	Result of source code review.	Ref 1. 2
	Methods Used:	<b>PC-TC-001, WI-FI-009</b>		
	Performed by:	GLI Europe BV		
<b>68</b>  R3.2.1  ID NL: KS.09.15_2.0	In terms of design and implementation, establish that each outcome of the Random Number Generator, and the result it has led to in the gambling, is recorded.	<b>N/A</b>	Out of scope of RNG analysis.	N/A
	Methods Used:	<b>PC-TC-001, WI-FI-009</b>		
	Performed by:	N/A		
<b>78</b>  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.	<b>N/A</b>	Not a mechanical RNG.	N/A
	Methods Used:	<b>PC-TC-001, WI-FI-009</b>		
	Performed by:	N/A		

## Inspection Plan

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

GLI was provided the required materials to conduct a randomness evaluation on the **SHA1 PRNG RNG**. The scope of this evaluation was limited to software verification, source code review, and data analysis.

## 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 CMP process

Description of the manner in which the procedures referenced in the previous paragraph are applied by the licence holder:

Please refer to operator's CMP process.

## 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
<b>GLI Policy for Testing Checkoffs and Forms</b>	<b>PC-TC-001</b>	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.
<b>Inspection Assessments for Netherlands Remote</b>	<b>WI-FI-009</b>	GLI Europe B.V.	This Work Instruction prescribes the procedure for conducting Inspection Assessments for Remote Gaming Systems, or components thereof, against the requirements detailed in the Gaming System Assessment Scheme.

The RNG assessed in this report was originally tested by iTech Labs under their applicable accreditation (ISO/IEC 17025 and ISO/IEC 17020) granted by NATA (Accreditation number 15690).

The tests performed by iTech Labs include (per the evaluation report for this game issued by iTech Labs):

- Data collection and statistical analysis (Chi squared and DieHard).
- Source code Review and software build
- Other records

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



## Findings

No non-conformities were found.





## Conditions of Evaluation

GLI's compliance evaluation of the Eyecon Alderney Limited's RNG is subject to the following conditions:

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

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

Verify+ by Kobetron™ - Verification Procedure for Files or Directories:

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



## Conclusion

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

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

Sincerely,

James Boje  
Managing Director EMEA  
Executive