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RvA Registration Number of Accreditation applicable to this Report:	
Testing	L372

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Identification Code of the Report

MO-385-EYL-25-02

Issuance Date

10 June 2025

**Type of
Evaluation Report**

Final Functionality Evaluation Report – Singular License - Slots

Evaluating Entity:

GLI Europe B.V.

**Dates of Performance of
the Evaluation Work:**

02 June 2025 / 02 June 2025

Jurisdiction:

Spain Online

Law 13/2011, of May 27, on Gambling Regulation

Royal Decree 958/2020, of 03 November, on commercial communications of gambling activities.

Royal Decree 1613/2011, of November 14, expanding on Law 13/2011, dated May 27, on Gambling Regulation, with respect to the technical requirements for gambling activities

Resolution of 06 October 2014 of the Gaming Regulation Board passing the provision developing the technical specifications of gaming, traceability and security which have to be fulfilled by technical gaming systems of a non-reserved nature forming the object of licenses granted under the Gaming Regulation Act nº 13/2011 of 27 May.

Resolution of 06 October 2014 by the General Gambling Control Directorate approving the provisions establishing the models for preliminary certification reports for technical projects and the model for the internal control system certification report, presented by applicants for general and single licenses for the operation and marketing of gambling.

Resolution of 06 October 2014, of the General Gambling Control Directorate, approving the regulation establishing the format and content of the definitive certification report for gaming operators' technical systems and extending the procedure for change management.

Resolution of December 29, 2017, the directorate-general of regulation of gaming agreeing to authorize a liquidity modality different from that proper to the participation of players with Spanish user registration for the game of online poker, and modifying certain decisions on the gaming activities provided for in the gaming regulation act nº 13/2011 of 27 May.

Resolution of 31 October 2018 of the Directorate-General for the Regulation of Gambling on the modification of certain resolutions about the gambling activities set out in Law 13/2011 of May 27 on Gambling Regulation.

Resolution of 06 June 2024 of General Directorate for Gambling Regulation, approving the data model of the monitoring system and amending Annexes I of the Resolutions of 06 October 2014 and 12 July 2012, regarding the technical specifications and the identification and subjective prohibitions on participation in gambling activities provided in Law 13/2011, 27th May, on the Gambling Regulation.

Order HAP/1370/2014, dated 25 July, by which the Basic Regulation of the chance machines gaming is approved.

Royal Decree 176/2023, of 14 March, which develops safer gaming environments.

GLI Europe B.V.

Diakenhuisweg 29 – 35

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The Netherlands

RvA L372

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Evaluating Laboratories:

**Evaluation Report
Recipient:**

Eyecon Alderney Limited

Millennium House, Ollivier Street,

Alderney GY9 3TD

Guernsey, Channel Islands

United Kingdom

Software Supplier:

Eyecon Alderney Limited

Millennium House, Ollivier Street,

Alderney GY9 3TD

Guernsey, Channel Islands

United Kingdom

Submitting Party:

Eyecon Alderney Limited

Millennium House, Ollivier Street,

Alderney GY9 3TD

Guernsey, Channel Islands

United Kingdom

Product Name:

Sugar Train

GLI's Internal information:
Modified 30 April 2025

Final Functionality Evaluation Report
LC385

Page 1 of 27



Description of the Product Evaluated: **Sugar Train**
Evaluation requested on 08 April 2025.

Internal File Number: MO-385-EYL-25-02

Testing Result: **Compliant**

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

Identification details of the person signing the Evaluation Report:
James Boje
Managing Director EMEA
Executive

[2] Description of the object of evaluation

This Report relates only to the product(s) listed.

GLI tested Eyecon Alderney Limited singular license – Slot Technical System for regulatory compliance against the current Spanish standards (listed on page 1 of this Report).

- For Eyecon Alderney Limited the game type evaluated is Slots.
- The game is accessible via the Internet (web-site).
- The game is accessible via Desktop and Mobile.
- This report is for Eyecon Alderney Limited, who is a B2B software provider to third party operators.
- Eyecon Alderney Limited does not own or manage players.

Game Name (Used by Operator)	Game Name (Used by Manufacturer)	Clients Evaluated				
		Windows Desktop Client	FLASH	HTML5	Native iOS Mobile Client	Native Android Mobile Client
"Sugar Train"	"Sugar Train"	-	-	x	-	-

For version-control of the "Sugar Train " GLI gathered Secure Hash Algorithm One (SHA-1) checksums of the following software files:

File Name	Location	SHA-1 Checksum	Manufacturer	Version	Critical	DPC
Sugar Train						
carbine-game-engine-5.17.3.jar	Server	53895C7A89154315BB862CB3EFDDBC7718C9608D	Eyecon Alderney Limited	5.17.3	Yes	N/A
EvaluationChain.class	Server	E9C22E7207EFD683DB6817F7FE83FD77CA054E89	Eyecon Alderney Limited	5.17.3	Yes	N/A
ReelSymbolExpander.class	Server	C5FB3D2007CF2335B804BBAA0776311765A3169B	Eyecon Alderney Limited	5.17.3	Yes	N/A
CountSymbolEvaluator.class	Server	5B672DCAEB2EE1F8E4E217EBC22E855CAEF262F6	Eyecon Alderney Limited	5.17.3	Yes	N/A
LinesWinMultiPatternEvaluator.class	Server	66E0E54523D54065ADEAD2D0DADEFABAD62AE91	Eyecon Alderney Limited	5.17.3	Yes	N/A
PatternMatchingEvaluator.class	Server	445D14E7008AEB2ADC2F1D7F9501F07155E300BC	Eyecon Alderney Limited	5.17.3	Yes	N/A
PrizeLinePatternMatchingEvaluator.class	Server	D95B04EA9A6BD03E511902829FCF07FD58AA3C96	Eyecon Alderney Limited	5.17.3	Yes	N/A
RebetsLineWinPatternMatchingEvaluator.class	Server	2C6CA5C8A2A21D390C5CB72A4F150A893CFB4C50	Eyecon Alderney Limited	5.17.3	Yes	N/A
DisplayGenerator.class	Server	98934DD5144D30275E248F249D6BBD1E205F1E0F	Eyecon Alderney Limited	5.17.3	Yes	N/A



[2] Description of the object of evaluation

For version-control of the “Sugar Train” GLI gathered Secure Hash Algorithm One (SHA-1) checksums of the following software files:

File Name	Location	SHA-1 Checksum	Manufacturer	Version	Critical	DPC
Sugar Train						
RebetDetailBuilder.class	Server	7985465EA53A6FA715E955B62C9C9CB20DF7FB09	Eyecon Alderney Limited	5.17.3	Yes	N/A
RebetEvaluator.class	Server	917D2DB667E3CC9B7948E0FEDB865ACB6DC1560F	Eyecon Alderney Limited	5.17.3	Yes	N/A
ReelStripGenerator.class	Server	8BA9847BC3CAB82131028C7F006CB48158F962D9	Eyecon Alderney Limited	5.17.3	Yes	N/A
ResetRebetEvaluator.class	Server	8A575FE26CFF9E274584C71AECF4F078509F8005	Eyecon Alderney Limited	5.17.3	Yes	N/A
PrizeLineTriggerEvaluator.class	Server	FD3CA5480EF084048F53B9DF7D3B3F4A44748876	Eyecon Alderney Limited	5.17.3	Yes	N/A
TriggerRandomMultiplierEvaluator.class	Server	069F725B648D95A8C51C8285FCBE70C089792F78	Eyecon Alderney Limited	5.17.3	Yes	N/A
CarbineGame.class	Server	D187FC1145DB98232D9A75FAE3BB6BABE37AA3EE	Eyecon Alderney Limited	5.17.3	Yes	N/A
CarbineGameComponent.class	Server	C7585F7B8C7E1101DFF6010DB2D68EE9DD9F023C	Eyecon Alderney Limited	5.17.3	Yes	N/A
GameWinsCalculatorImpl.class	Server	BC67862F3ACB319099C003C43D3DC097D3A53D28	Eyecon Alderney Limited	5.17.3	Yes	N/A
PrizeMultiplier.class	Server	6F3D9718F22B339FCF2234B94C66C7A5740F712F	Eyecon Alderney Limited	5.17.3	Yes	N/A
RetriggerCount.class	Server	44F2CF802D72121B3BC39FD64061AD2F16D56BD4	Eyecon Alderney Limited	5.17.3	Yes	N/A
EyeconSpinGameRules.class	Server	44201515F1F86C8359960521DB5E26EDA0529C70	Eyecon Alderney Limited	5.17.3	Yes	N/A
Multiplier.class	Server	F531EE860F01A7E834D54699147D410DBE0050C0	Eyecon Alderney Limited	5.17.3	Yes	N/A
RngSequences.class	Server	B5E85B10AB646B596E6BE2F98EA8230C6F966ED4	Eyecon Alderney Limited	5.17.3	Yes	N/A
ReactorGameMessage.class	Server	052B3DB83EB8F5A2DF4FF17AFB70FFCEDBAC0592	Eyecon Alderney Limited	5.17.3	Yes	N/A
ReactorGameMode.class	Server	C53E6194D2040BDD159716A0892EDA636881C651	Eyecon Alderney Limited	5.17.3	Yes	N/A
ReactorGameRules.class	Server	5602165CE8F0F68DB486F3684945901C49B7ABAD	Eyecon Alderney Limited	5.17.3	Yes	N/A



[2] Description of the object of evaluation

For version-control of the “Sugar Train” GLI gathered Secure Hash Algorithm One (SHA-1) checksums of the following software files:

File Name	Location	SHA-1 Checksum	Manufacturer	Version	Critical	DPC
Sugar Train						
ReactorGameState.class	Server	EF9E0C74D3325975922FF33943516135992C5ED0	Eyecon Alderney Limited	5.17.3	Yes	N/A
ResultType.class	Server	86C691A6959337B3390CD43C3B4E8C2C5B2C83B2	Eyecon Alderney Limited	5.17.3	Yes	N/A
WinRejector.class	Server	B273174868A166A84B7AA9445C706DC4698C9F76	Eyecon Alderney Limited	5.17.3	Yes	N/A
display\grid\ReactorGrid.class	Server	0B3DFF256B6AAA5629A AFF5E73DF4DB03CED2A26	Eyecon Alderney Limited	5.17.3	Yes	N/A
ConditionalWinResult.class	Server	E3C9567F65657425B73E767CAD768A38AD327CE7	Eyecon Alderney Limited	5.17.3	Yes	N/A
ReactorGame.class	Server	5415E9FDC44E25927E1848B82B3A29AB44EC2284	Eyecon Alderney Limited	5.17.3	Yes	N/A
ReactorGameAudit.class	Server	D76A257EA69E37DC605271FC68C3E7AC1D3D6801	Eyecon Alderney Limited	5.17.3	Yes	N/A
ReactorGameCounterUpdateMessage.class	Server	B027505E654F2CEB200C4115725553596083ECCA	Eyecon Alderney Limited	5.17.3	Yes	N/A
ReactorGameLevelState.class	Server	4C611B1CCEA4C408642DA6FCA277470C255E7E3F	Eyecon Alderney Limited	5.17.3	Yes	N/A
SlotGameVariableConfigurationImpl.class	Server	7A66132A82AA2E17458EB0FACEAB823B27635028	Eyecon Alderney Limited	5.17.3	Yes	N/A
SymbolHoldSpinGame.class	Server	60B9EA9E815CE61119FC2B6111D315C473F15485	Eyecon Alderney Limited	5.17.3	Yes	N/A
SymbolHoldSpinRuleImpl.class	Server	EBBFC0412A54A19FA8B9E4D24DC7890E6DD6FC30	Eyecon Alderney Limited	5.17.3	Yes	N/A
SymbolHoldSpinScreenEvaluator.class	Server	7513314BF6290A31C239FA597B6BF681D8FC92BA	Eyecon Alderney Limited	5.17.3	Yes	N/A
SymbolHoldTriggerEvaluator.class	Server	6AEC46DEEA088EB6C4ABF85169426C0598D3F232	Eyecon Alderney Limited	5.17.3	Yes	N/A
SymbolSwapSpinShapeEvaluator.class	Server	247C9BF8FB01A2EE6E9CBFE7826455979B5273A1	Eyecon Alderney Limited	5.17.3	Yes	N/A
SymbolSwapSpinTriggerEvaluator.class	Server	BA50946EE127837792EBFCC08BFA3737D309CD8D	Eyecon Alderney Limited	5.17.3	Yes	N/A
carbine-slots_sugarTrain_90_jackpot-3.1.12-config.jar	Server	0D205027338CD20394235E65B15FBB73B783AF2F	Eyecon Alderney Limited	5.17.3	Yes	N/A



[2] Description of the object of evaluation

For version-control of the “**Sugar Train**” GLI gathered Secure Hash Algorithm One (SHA-1) checksums of the following software files:

File Name	Location	SHA-1 Checksum	Manufacturer	Version	Critical	DPC
Sugar Train						
carbine-slots_sugarTrain_90_jackpot-3.1.12.json	Server	BF1986A458147FF4A1E8BE71B44E9AEA8FE5DA74	Eyecon Alderney Limited	5.17.3	Yes	N/A
pool-server-service-1.7.0.jar	Server	473EEB4DE802BDAF606E069671571F7AEC2F8787	Eyecon Alderney Limited	5.17.3	Yes	N/A
MysteryPoolImpl.class	Server	B23E9682BB112E26FFB96668AE57E03751989402	Eyecon Alderney Limited	5.17.3	Yes	N/A
ProbabilityPoolImpl.class	Server	704C70A769C6984F58A2C9AF1CDB790C9029313E	Eyecon Alderney Limited	5.17.3	Yes	N/A

The games are designed to allow configurable parameters and GLI has verified that the games provided for evaluation are operating in accordance with the game rules and any applicable regulatory requirements. It is therefore the Operator’s responsibility. to ensure that configurations compliant with regulatory requirements are deployed in the production environment.

To comply with the requirement OM_AZA Article 14.4., the autoplay feature must be configured to not exceed a maximum of 100 autoplay games.

To comply with the requirement OM_AZA Article 14.5., the time per game must be configured so that each game has a minimum duration of 3 seconds.

It is the Operator’s responsibility. to verify that each participant is provided a reproduction of all game replays with a graphic reconstruction, or an intelligible description as stated in the requirement RES_TEC Annex I. 3.14.

[3] Executive summary of the functionality evaluation

[3.1] GLOBAL CLASSIFICATION OF FUNCTIONALITY

Global classification of functionality	Compliant
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[3.2] SUMMARY TABLE OF COMPLIANCE WITH TECHNICAL REQUIREMENTS

Technical requirements for singular licenses	Number of requirements	Number of compliant requirements	Number of non-compliant requirements	Number of non-applicable requirements
Area: Percentage return and prize tables	3	2	0	1
Area: Random number generator (RNG)	6	5	0	1
Area: Game logic	3	3	0	0
Area: Registration and traceability	4	1	0	3
Area: Terminals and session	13	3	0	10
Area: Communication channels	5	0	0	5
Area: Free gaming applications	1	0	0	1
Area: Graphic interface	7	4	0	3
Area: Behaviour in the event of technical errors	2	1	0	1
Area: Automatic game	1	1	0	0
Area: Repetition of the play	1	0	0	1
Area: "Live" games	1	0	0	1
Area: Various functionalities	5	0	0	5
Area: Progressive jackpots	1	1	0	0
Area: Internal control system	10	0	0	10



[3] Executive summary of the functionality evaluation

[3.2] SUMMARY TABLE OF COMPLIANCE WITH TECHNICAL REQUIREMENTS

Technical requirements for singular licenses for “Slots”	Number of requirements	Number of compliant requirements	Number of non-compliant requirements	Number of non-applicable requirements
Area: Game development	12	9	0	3
Area: Economic limits to participation	1	0	0	1
Area: Obligations to inform the participants	10	5	0	5
Area: Promotion of games.	1	0	0	1
Area: Configuration and development of the game session under the general license of "Other games"	5	0	0	5
Area: Information obligations to participants in relation to the gaming session under the general license of "Other games"	1	0	0	1

[3] Executive summary of the functionality evaluation

[3.3] SUMMARY TABLE OF SPECIFIC ANALYSES:

[3.3.2] ANALYSIS OF THE RANDOM NUMBER GENERATOR

RNG testing is out of scope of this evaluation, RNG was tested by iTech Labs in report ITL2401052, dated 04 July 2024.

[3.3.3] ANALYSIS OF THE PERCENTAGE OF RETURN TO THE PLAYER

Published percentage of return to the player for the game.	<table><tr><th>Published RTP</th><th>GLI's RTP</th></tr><tr><td>90.000% + 3.0%(Jackpot)</td><td>89.91% + 3.0%(Jackpot)%*</td></tr><tr><td colspan="2"></td></tr></table>		Published RTP	GLI's RTP	90.000% + 3.0%(Jackpot)	89.91% + 3.0%(Jackpot)%*		
	Published RTP	GLI's RTP						
	90.000% + 3.0%(Jackpot)	89.91% + 3.0%(Jackpot)%*						
The percentage of return is published in the "Slot Rules" section of the game.								
* GLI has confirmed that the published RTP values either: a) lie within expected statistical limits of equivalent values computed from simulated test data, or b) match those derived analytically from a mathematical model of the game								

[3.3.4] ANALYSIS OF THE LOGIC OF THE GAME AND THE RANDOM EVENTS

Compliance with particular rules of the game.	Yes.
Risk management system for straight bets.	Not applicable – It does not offer straight bets.
Audit of changes in the configuration by means of parameters of the risk management system for straight bets.	Not applicable – It does not offer straight bets.
Audit of changes on bets made by the operator's personnel.	No.
List of random events.	The return of random numbers determines the reel stops for base game and free spins. Also checks against weighted tables for bonus features to determine outcomes of those features.
Audit of changes in the configuration by means of parameters of the logic of the game.	No. Game logic can't be changed since a change in the game logic will lead to changes in critical files and a substantial change to the Singular License.

[3] Executive summary of the functionality evaluation

[3.4] SUMMARY TABLE OF THE INTEGRATION TESTS

Area and reference of the requirement	Classification
B.1 Range of games offered	
B.1.1. Range of games offered and game variants.	Not applicable*
B.1.2. Execution of the game and correct accounting.	Not applicable*
B.1.3. Trace of the participation for channels other than Internet.	Not applicable*
B.2 Economic limits on participation	
B.2.1. Economic limits on participation.	Not applicable*
B.3. Behaviour in response to technical errors	
B.3.1. Loss of communication with the client.	Not applicable*
B.3.2. Error in the client.	Not applicable*
B.4. Internal control system	
B.4.1. Integrity of OPT/ORT records.	Not applicable*
B.4.2. Integrity of JUT/JUD records.	Not applicable*

* Eyecon Alderney Limited .is not acting as an operator. This will be evaluated on the operator's side.

[4] Details on compliance with the technical requirements

The rating and remarks listed in the table below are applicable to all games, variants and access channels except otherwise indicated in the remarks field.

Area and reference of the requirement	Rating	Remarks
Area: Percentage return and prize tables		
RES_TEC Annex I. 3.1. Basic gaming regulation.	Compliant	
RES_TEC Annex I. 3.3. Percentage return to participant.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 3.4. Prize tables.	Compliant	
Area: Random number generator (RNG)		
RES_TEC Annex I. 3.5.1. Functioning of the RNG.	Compliant	
RES_TEC Annex I. 3.5.1. Functioning of the RNG. (cryptographically strong RNG)	Compliant	
RES_TEC Annex I. 3.5.2. Scaling methods.	Compliant	
RES_TEC Annex I. 3.5.3. RNG Hardware.	Not applicable	Software RNG only.
RES_TEC Annex I. 3.5.4. Errors in the RNG	Compliant	
RES_TEC Annex I. 3.5.5. Reseeding of the RNG.	Compliant	
Area: Game logic		
RES_TEC Annex I. 3.6.1. Logic independent from the user terminal.	Compliant	
RES_TEC Annex I. 3.6.2. Application of the RNG in the games.	Compliant	
RES_TEC Annex I. 3.6.3. Controls of the game logic.	Compliant	
Area: Registration and traceability		
RD_TEC Article 4.1.a) and c) Requirements of the Central Gaming Unit.	Compliant	
RES_TEC Annex I. 6.1. Registration and traceability.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 6.3. Time source.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 7.5. Registration and traceability in international liquidity environment.	Not applicable	Operator's responsibility.
Area: Terminals and session		
RES_TEC Annex I. 3.7.1.1. Identification of terminals.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 3.7.1.2. Functionality of the terminal. Operations' traceability.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 3.7.2.1. Installation of components in the user's equipment.	Not applicable	Operator's responsibility.
RES_TEC Annex I.3.7.2.2. Disadvantage due to connection quality.	Not applicable	Game outcome or development are not influenced by connection quality.
RES_TEC Annex I.3.7.2.3. Information on connection quality.	Compliant	
RES_TEC Annex I.3.7.2.4. Reduced functionality for certain terminals.	Compliant	
RES_TEC Annex I. 3.7.2.5. Minimum terminal resources.	Not applicable	Operator's responsibility.

[4] Details on compliance with the technical requirements

The rating and remarks listed in the table below are applicable to all games, variants and access channels except otherwise indicated in the remarks field.

Area and reference of the requirement	Rating	Remarks
Area: Terminals and session		
RES_TEC Annex I. 3.7.3.1. Management of participants' data	Not applicable	No such terminals are under the scope of this evaluation.
RES_TEC Annex I. 3.7.3.2. Physical design.	Not applicable	No such terminals are under the scope of this evaluation.
RES_TEC Annex I. 3.7.3.3. Terminal integrity.	Not applicable	No such terminals are under the scope of this evaluation.
RES_TEC Annex I. 3.7.3.4. Mobile terminals.	Not applicable	No such terminals are under the scope of this evaluation.
RES_TEC Annex I. 3.8.1. Disconnection due to inactivity.	Compliant	
RES_TEC Annex I. 3.8.2. Registration of the user sessions.	Not applicable	Operator's responsibility.
Area: Communication channels		
RD_TEC Article 15.1 and 2. Gaming activities undertaken via the Internet.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 3.2. Redirection to ".es" domain.	Not applicable	Operator's responsibility.
RD_TEC Article 16. Gaming activities undertaken via texting using fixed or mobile phones.	Not applicable	No gaming activities undertaken via texting.
RD_TEC Article 17. Gaming activities using voice communication services.	Not applicable	No gambling activities via voice communication services.
RD_TEC Article 18. Gaming activities using audiovisual communication media.	Not applicable	No gambling activities via audio-visual communication methods.
Area: Free gaming applications		
RD_COM Article 14.1. Free gaming applications.	Not applicable	Operator's responsibility.
Area: Graphic interface		
LEY_RJU Article 6.1.a. Theme of the user interface.	Compliant	
RES_TEC Annex I. 3.9.1. Data of the game.	Compliant	
RES_TEC Annex I. 3.9.2. Data of the participant.	Compliant	
RES_TEC Annex I. 3.9.3. Prizes.	Compliant	
RES_TEC Annex I. 3.9.4. Card games.	Not applicable	No card games are present in this evaluation
RES_TEC Annex I. 3.9.5. Simulation of elements from real life.	Not applicable	The games in this submission don't contain elements from real life.
RES_TEC Annex I. 3.9.6. Graphic interface of third parties.	Not applicable	No third party graphic interface is provided.
Area: Behaviour in the event of technical errors		
RES_TEC Annex I. 3.11. Disabling of a game or a user session.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 3.12. Incomplete game.	Compliant	
Area: Automatic game		
RES_TEC Annex I. 3.13. Autoplay.	Compliant	

[4] Details on compliance with the technical requirements

The rating and remarks listed in the table below are applicable to all games, variants and access channels except otherwise indicated in the remarks field.

Area and reference of the requirement	Rating	Remarks
Area: Repetition of the play		
RES_TEC Annex I. 3.14. Game replay.	Not applicable	Operator's responsibility.
Area: "Live" games		
RES_TEC Annex I. 3.19. "Live" gaming.	Not applicable	No live games are offered.
Area: Various functionalities		
RES_TEC Annex I. 3.15. Virtual players.	Not applicable	No virtual players are available in the games under evaluation.
RES_TEC Annex I. 3.16. Metamorphic games.	Not applicable	No metamorphic games are under the scope of this evaluation.
RES_TEC Annex I. 3.17. Participant in "absent" status.	Not applicable	No multiplayer games are being approved.
RES_TEC Annex I. 3.18. Multi-participant games with host.	Not applicable	No multi-participant games are offered.
RES_TEC Annex I. 3.21. Games over "delayed" communication channels.	Not applicable	No such feature.
Area: Progressive jackpots		
RES_TEC Annex I. 3.20. Jackpots, progressive jackpots and additional prizes.	Compliant	
Area: Internal control system		
RD_TEC Article 13. Internal control system.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 5.1.2. DGOJ access to the vault.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 5.1.3. ICS data model.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 5.1.4. ICS time source.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 5.1.5. Signing, compression and encryption of the ICS data.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 5.1.6. Performance of the grabber and vault.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 5.1.8. Unavailability of the ICS and suspension of the gaming offer.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 5.1.11. Quality of ICS data.	Not applicable	Operator's responsibility.
RES_TEC Annex I. 5.1.14. Vault location in the European Union.	Not applicable	Operator's responsibility.
RES_MOD Annex I. Data model for monitoring.	Not applicable	Operator's responsibility.

[4] Details on compliance with the technical requirements

The rating and remarks listed in the table below are applicable to all games, variants and access channels except otherwise indicated in the remarks field.

Area and reference of the requirement	Rating	Remarks
Area: Game development		
OM_AZA Article 2. Definitions.	Compliant	
OM_AZA Article 6. Particular rules for the game of slot machines.	Compliant	
OM_AZA Article 11. Conduct of the game.	Compliant	
OM_AZA Article 12.1. Economic limits to participation in the game of slot machines.	Compliant	
OM_AZA Article 13.1. Participation in the game.	Compliant	
OM_AZA Article 13.3. Participation in the game. Interruption of a session or a game.	Not applicable	This is an operator's responsibility.
OM_AZA Article 13.4. Participation in the game. Cancelled game.	Not applicable	This is an operator's responsibility.
OM_AZA Article 14.4. Game's limit in autoplay mode.	Compliant	
OM_AZA Article 14.5. Minimum duration of a game.	Compliant	
OM_AZA Article 14.6. Assignment of prizes.	Compliant	
OM_AZA Article 14.7. Progressive Jackpots.	Compliant	
OM_AZA Article 15. Payment of winnings.	Compliant	
Area: Economic limits to participation		
OM_AZA. Article 12.2. Economic limits to participation in gambling machines	Not applicable	This is an operator's responsibility.
Area: Obligations to inform the participants		
OM_AZA Article 8.1.1. Specific rules publication.	Not applicable	This is an operator's responsibility.
OM_AZA Article 8.1.2.a. Operator information and enabling titles.	Not applicable	This is an operator's responsibility.
OM_AZA Article 8.1.2.b. Information in the complaints handling system.	Not applicable	This is an operator's responsibility.
OM_AZA Article 8.1.2.c. Rules and ways of participation.	Compliant	
OM_AZA Article 8.1.2.d. Responsible Gaming policies.	Not applicable	This is an operator's responsibility.
OM_AZA Article 8.1.2.e. Theoretical RTP% and actual RTP% in the last 6 months.	Compliant	
OM_AZA Article 8.1.2.f. Minimum and Maximum prize of a game.	Compliant	
OM_AZA Article 8.1.2.g. Ways to conduct the game.	Compliant	
OM_AZA Article 8.1.2.h. Description of winning combinations and prizes.	Compliant	
OM_AZA Article 8.1.2.k. Contribution to progressive jackpot.	Compliant	
Area: Promotion of games		
OM_AZA Article 9.2. Promotion of the games.	Not applicable	This is an operator's responsibility.

[4] Details on compliance with the technical requirements

The rating and remarks listed in the table below are applicable to all games, variants and access channels except otherwise indicated in the remarks field.

Area and reference of the requirement	Rating	Remarks
Area: Configuration and development of the game session under the general license of "Other games"		
RD_ESJ Article 13.3. Session configuration. Ability to restrict future session.	Not applicable	This is an operator's responsibility.
RD_ESJ. Article 13.4. Impossibility of modifying the session during the course of it.	Not applicable	This is an operator's responsibility.
RD_ESJ. Article 13.5. Automatic session closure for reaching the limit. The operator anticipates to the participant the proximity of compliance with limits.	Not applicable	This is an operator's responsibility.
RD_ESJ. Article 13.7. Warning compulsive gaming on session restart within 60 minutes.	Not applicable	This is an operator's responsibility.
RES_TEC Annex I. 2.1.14. Register of session configuration.	Not applicable	This is an operator's responsibility.
Area: Information obligations to participants in relation to the gaming session under the general license of "Other games"		
RD_ESJ Article 16. Specific autoevaluation messages	Not applicable	This is an operator's responsibility.



[5] Details on the specific analyses

[5.2] ANALYSIS OF THE RANDOM NUMBER GENERATOR

RNG testing is out of scope of this evaluation, RNG was tested by iTech Labs in report ITL2401052, dated 04 July 2024.

[5.3] ANALYSIS OF THE RETURN TO THE PLAYER IN THE GAMES

Published RTP	GLI's RTP
90.000% + 3.0%(Jackpot)	89.91% + 3.0%(Jackpot)%*

The percentage of return is published in the "SLOT RULES" section of the game.

* GLI has confirmed that the published RTP values either:

- a) lie within expected statistical limits of equivalent values computed from simulated test data, or
- b) match those derived analytically from a mathematical model of the game

[5.4] ANALYSIS OF THE LOGIC OF THE GAME AND RANDOM EVENTS

Source code has been reviewed and checked against the artwork. The correct payout and behavior have been verified through functionality testing.

The return of random numbers determines the reel stops for base game, free spins and weighted tables for bonus features. The information has been verified during source code review and game emulation.

The gaming system does not have any configurable parameters which affect gameplay or manual changes that can be made to bets or wins.

Accounting in the game has been verified through functionality testing and review of back office accounting reports. All bets and wins can be reviewed and audited via the same back office reports.



[6] Detail of the integration tests

B. SINGULAR LICENSES

B.1. Range of games offered.

Area	Range of games offered.
Reference of the test	B.1.1
Name of the test	Range of games offered and game variants.
Description of the test	Not applicable
Expected result	<p>The result will give a list, with the following information:</p> <ul style="list-style-type: none">- The commercial name of the games and variants found.- The applications or terminals from which they are available.- Their correspondence with the variants in the basic regulations.- The version of the particular rules assessed. <p>This information shall be cross-checked against the descriptive licence questionnaire filled in by the operator.</p>
Type of test	FUNCTIONAL
Date/time the test is performed	Not applicable
Result obtained	Not applicable
Classification	Not applicable
Comments	Not applicable

[6] Detail of the integration tests

B. SINGULAR LICENSES

B.1. Range of games offered.

Area	Range of games offered.
Reference of the test	B.1.2
Name of the test	Execution of the game and correct accounting.
Description of the test	Not applicable
Expected result	<p>FUNCTIONAL Compliance in the tests described above, broken down for each variant analysed. It shall be checked that it is not possible to stake a greater amount than the amount available in the gaming account. Also, the version of particular rules shall be indicated.</p> <p>TRACEABILITY The result shall describe the tables, files or others containing the information. A judgement shall be issued over whether the gaming technical system's recording system permits the retrieval of information to explain every one of the situations, and also to totally reconstruct what happened in every game.</p>
Type of test	FUNCTIONAL, TRACEABILITY
Date/time the test is performed	Not applicable
Result obtained	Not applicable
Classification	Not applicable
Comments	Not applicable

[6] Detail of the integration tests

B. SINGULAR LICENSES

B.1. Range of games offered.

Area	Range of games offered.
Reference of the test	B.1.3
Name of the test	Trace of the participation via channels other than Internet.
Description of the test	Not applicable
Expected result	<p>TRACEABILITY</p> <p>The system records and logs of each of the participation channels used shall be analysed, checking that in the case of SMS and telephone, the system stores the detail of:</p> <ul style="list-style-type: none"> - Date/time of each message or call made. - Telephone number originating the message or call. - Contents of message or call.
Type of test	TRACEABILITY
Date/time the test is performed	Not applicable
Result obtained	Not applicable
Classification	Not applicable
Comments	Not applicable



[6] Detail of the integration tests

B. SINGULAR LICENSES

B.2. Financial limits.

Area	Economic limits on participation.
Reference of the test	B.2.1
Name of the test	Financial limits.
Description of the test	Not applicable
Expected result	A statement shall be made of the tests performed and the result obtained.
Type of test	FUNCTIONAL
Date/time the test is performed	Not applicable
Result obtained	Not applicable
Classification	Not applicable
Comments	Not applicable



[6] Detail of the integration tests

B. SINGULAR LICENSES

B.3. Behaviour in response to technical errors.

Area	Behaviour in response to technical errors.
Reference of the test	B.3.1
Name of the test	Loss of communication with the client.
Description of the test	Not applicable
Expected result	Compliance with the particular rules shall be indicated. The result shall show the behaviour observed for each terminal, application or client and for each game or modality. The version of particular rules analysed shall also be included.
Type of test	FUNCTIONAL
Date/time the test is performed	Not applicable
Result obtained	Not applicable
Classification	Not applicable
Comments	Not applicable



[6] Detail of the integration tests

B. SINGULAR LICENSES

B.3. Behaviour in response to technical errors.

Area	Behaviour in response to technical errors.
Reference of the test	B.3.2
Name of the test	Error in the client.
Description of the test	Not applicable
Expected result	Compliance with the particular rules shall be indicated. The result shall show the behaviour observed for each terminal, application or client and for each game or modality. The version of particular rules analysed shall also be included.
Type of test	FUNCTIONAL
Date/time the test is performed	Not applicable
Result obtained	Not applicable
Classification	Not applicable
Comments	Not applicable

[6] Detail of the integration tests

B. SINGULAR LICENSES

B.4. Internal control system.

Area	Internal control system.
Reference of the test	B.4.1
Name of the test	Integrity of OPT/ORT records.
Description of the test	Not applicable
Expected result	<p>The data in the OPT/ORT files will be cross-checked against the listings obtained from the gaming technical system back office. The certifying body must satisfy itself of the accuracy of these listings, given that they are the source used to cross-check the integrity of ICS real data.</p> <p>As a result of this test, the certifying body must include:</p> <ul style="list-style-type: none"> - The compliance of the tests carried out. - The following OPT/ORT data, calculated from the monthly data, for each month: The ratio between the winnings amount and the stake amount (expressed to 4 decimal places). <p>Note: The result shall not directly include turnover.</p> <p>Note: The checks and calculations shall be carried out separately, in EUR monetary units and in any other unit, whether bonus points or others.</p>
Type of test	REAL DATA
Date/time the test is performed	Not applicable
Result obtained	Not applicable
Classification	Not applicable
Comments	Not applicable

[6] Detail of the integration tests

B. SINGULAR LICENSES

B.4. Internal control system.

Area	Internal control system.
Reference of the test	B.4.2
Name of the test	Integrity of JUC record.
Description of the test	Not applicable
Expected result	<p>The data in the JUC files will be cross-checked against the listings obtained from the gaming technical system back office. The certifying body must satisfy itself of the accuracy of these listings, given that they are the source used to cross-check the integrity of ICS real data.</p> <p>As a result of this test, the certifying body must include:</p> <ul style="list-style-type: none"> - The compliance of the tests carried out. <p>Note: The result shall not directly include turnover.</p> <p>Note: The checks and calculations shall be carried out separately, in EUR monetary units and in any other unit, whether bonus points or others.</p>
Type of test	REAL DATA
Date/time the test is performed	Not applicable
Result obtained	Not applicable
Classification	Not applicable
Comments	Not applicable



[7] Description of the place, equipment and dates of performance of the evaluation process

Place: GLI Europe B.V., Diakenhuisweg 29 – 35, 2033AP Haarlem, The Netherlands.

Place: Itech Test Labs India Private Limited, No. 1, 2nd Floor, Aurobindo Street, Puducherry, Pondicherry, 605001, India.

Equipment: Testing workstations with Windows 11 based Operating Systems.

Evaluation Period: 02 June 2025/ 02 June 2025

[7.1] INTERNAL METHODS USED REFERENCE:

- PC-TC-001*
- WIP 24*
- WI-MA-002*

* The evaluation was conducted fully or partially by a subcontracted GLI office. Please refer to the abovementioned "Evaluating Laboratories".



[8] Description of any environments used in the tests different from that actually used by the operator for the execution of the gaming activity

The game content for “**Sugar Train**” was tested in a test environment. GLI has identified all critical files and documented as such in the report.



[9] Description of the digital support which will accompany the evaluation report

To the submitter of this Report, a file named MO-385-EYL-25-02.zip with the below listed documents is provided:

- Complete evaluation report
- Evidence of evaluation of the technical requirements placed in the “Technical Requirements” folder
- Binaries