

eCOGRA LIMITED

HELLENIC GAMING COMMISSION

GAME CERTIFICATE

FOR

NG ENTERTAINMENT LTD

REPORT REFERENCE NUMBER: E239786NTGGRCM

REPORT ISSUE DATE: 31 JULY 2023



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1. GENERAL INFORMATION

CLIENT NAME:

CLIENT ADDRESS:	30/1 Kenilworth Court Sir Augustus Bartolo Street TA' Xbiex XBX 1093 Malta
Manufacturer:	NG Entertainment Ltd 30/1 Kenilworth Court Sir Augustus Bartolo Street TA' Xbiex XBX 1093 Malta
LICENSES HELD:	Manufacturer Suitability License: HGC-000101-MN
CLIENT CONTACT PERSON:	Pallavi Deshmukh
CLIENT E-MAIL ADDRESS:	pallavi@netgaming.com
CLIENT TELEPHONE NUMBER/SKYPE:	+44 7305 266574
ASSESSMENT BODY NAME:	eCOGRA Limited ('eCOGRA')
ASSESSMENT BODY LEGAL FORM:	Private Company
ASSESSMENT BODY MANAGING ADDRESS:	2nd Floor Berkeley Square House, Berkeley Square, London, W1J 6BD, United Kingdom
ASSESSMENT BODY ACCREDITATIONS HELD:	An Accredited Testing Laboratory No. 4656. ISO/IEC 17025:2017, Issued By The United Kingdom Accreditation Service (Issue No: 031, Issue Date: 07 July 2023).
	An Accredited Inspection Body No. 4656. ISO/IEC 17020:2012, Issued By The United Kingdom Accreditation Service (Issue: 014, Issue Date: 20 June 2023).
	An Accredited Certification Body No. 4656. ISO/IEC 17065:2012, Issued By The United Kingdom Accreditation Service (Issue: 008, Issue Date: 15 December 2022).

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ASSESSMENT STANDARDS AND CRITERIA: Number 79841 EE 2020/24.07.2020 (B 3266) - Establishing a

Technical Specifications (TS) Gaming Regulation for Organising and Conducting Online Games of Chance (as amended by Decision of the Minister of Finance number 58876 EE

2022/06.05.2022 (B '2232)); and Number 79835 EΞ

2020/24.07.2020 (GG B 3265) - Establishing a Gaming Regulation for Organising and Conducting Online Games of Chance (as amended by Decision of the Minister of Finance number 67663 EΞ 2022/20.05.2022 (B '2483)); Directive 1. Protocol Number: 4914,

18 May 2021

ASSESSMENT SCOPE: Core games assessment and certification for Bison Gold in

accordance with ISO/IEC 17020:2012, ISO/IEC 17025:2017 and ISO/IEC 17065:2012, in addition to the above assessment

standards and criteria.

ASSESSMENT BODY REPRESENTATIVE: Bradley Khoury

ASSESSMENT BODY CONTACT EMAIL: info@ecogra.org

ASSESSMENT BODY CONTACT NUMBER: Tel: +44 20 7887 1480

DATES OF ASSESSMENT: 25 July 2023 - 31 July 2023

PLACE OF ASSESSMENT: Pre-Production Environment emulating The Live Environment.

REPORT TYPE: Game Certificate

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REPORT ISSUE DATE: 31 July 2023

ASSESSMENT RESULT: Compliant

ASSESSMENT BODY REPORT APPROVAL:

Andrew Bowman
Chief Financial Officer
eCOGRA



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2. Overview of the Gaming System Components

Game or gaming technology (including RNG)

Please note that this is an initial assessment conducted over Bison Gold and therefore this game report does not supersede any previous reports.

2.1. Game Overview

Game Name	Game ID	Game Version	Platform	Game Type	Paytable Identification Number
Bison Gold	Integer: 45	1.0	HTML5-Desktop	Slot	45

Game Client-Side Version Number Tested	1.0
Game Server-Side Version Number Tested	1.1

Game Description: Bison Gold is played with 1024 ways. Each game costs a minimum of 50 fixed coins. Payouts are made according to the paytable. Prizes are multiplied by the coin value. All symbols pay from left to right in consecutive order, excluding the Bonus symbol. Wild symbols substitute for all symbols, excluding the Bonus symbol. Each symbol can be used once per winning combination. Only the highest win in the winning combination is paid. Malfunction voids all pays and plays. For this game, the long-term expected payback is 94.08%.

Further details regarding the betting characteristics, features and detailed game rules can be found in the game instructions which can be provided upon request.

This assessment report highlights our key findings as a result of the evaluation conducted on the following channels:

 Microsoft Windows [Version 10.0.19045.2965]; Google Chrome Browser, Version 114.0.5735.91 (Official Build) (64-bit)

2.2. Percentage Return to Player ('RTP')

Paytable ID	Theoretical RTP %	eCOGRA RTP % Recalculation
45	94.08%	94.21%
	Buy Bonus: 94.51%	Buy Bonus: 94.67%

The theoretical RTP percentage indicated in the table above is extracted from the game documentation as provided by the supplier. eCOGRA recalculated the RTP percentage by performing additional independent mathematical calculations on the output of simulation game data.



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2.3. Game Critical Software Components

The scope of the game evaluation and reporting applies solely to the critical game files, critical game file's server versions and associated hashes provided in the table below:

Bison Gold - Server-side Game Critical Files

Software Element Name	Version Date	Server-side Software Version Number	Digital Signature (SHA#1 Hash)
line_wins_handler.inc.php	24/07/2023	1.1	4265BFE2ACF6549D2A8C2708DDCCC26E6657D396
ConfigurationBG.txt	24/07/2023	1.1	92DDBA7F158CDB0D5036006A2E8086B189780A52

2.4. Random Number Generator

The RNG utilised in evaluating the game output and games rules has been sufficiently and appropriately tested under a separate RNG testing report. Please refer to RNG report RN-385-NGT-21-01-484 issued by Gaming Laboratories international on 24 May 2023 for further details of testing conducted over RNG.



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3. Assessment and Evaluation Methods Applied

The sections below provide a high-level overview of the assessment and evaluation methods applied.

3.1. Games and Gaming Technology

Game design testing has included verification of the game mathematics, game artwork, the theoretical RTP and player-facing game rules. Software testing has included evaluation and verification of the software implementation of the game design aspects tested, with verification procedures conducted over games rules and the actual RTP, using methods of simulation, emulation, and manual testing. Game engine testing included verification of the scaling and mapping used to convert raw RNG output to game outcomes.

Game Assessments			
Game Software Assessment	Verification procedures over sufficiency and appropriateness of the client's internal		
	testing conducted over the game under assessment.		
Documentation Assessment	Evaluation of the supporting game documentation to ensure that it is consistent and		
	supports the game rules and logic present in the game.		
Source Code Assessment	Evaluation of the pertinent modules of the game source code for mapping of rules and		
	RNG calling.		
Mathematical Assessment	Review of the mapping of the random inputs to game outcomes in accordance with		
	prevailing probabilities and pay tables.		
	Review of the game design and game mathematics that determine the theoretical		
	RTP%.		
	Independent mathematical calculations of RTP% utilising complete, accurate and valid		
	simulated game data output, to verify the theoretical RTP% as per the game		
	mathematics documentation.		
	Game simulation (output) testing to ensure the game outcomes are randomly		
	generated and the actual RTP is within an acceptable range of the expected RTP.		
Playability Assessment	Inspection of game interface including artwork and graphics, and clear and correct		
	presentation of the game rules.		
	Evaluation of game accounting in accordance with game pay tables.		
Functionality Assessment	Comprehensive operational and functional client-side tests over the game mechanics		
	to ensure that game pay tables, game rules and help files are correctly implemented		
	in the operation of the game.		
	A check on whether it is possible to place a wager outside of the base game and		
	ordinary course of play, and if this wager directly activates a game feature outside of		
	the ordinary course of play.		
Emulation Assessment	Testing of rare outcomes through emulation to ensure that game pay outs, top prizes		
	and jackpot features (if applicable) operate correctly.		

Further documentation assessments, game functionality assessments and game artwork and game rule review assessments were conducted to verify that the game conformed to relevant certifiable requirements.



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4. ASSESSMENT RESULTS — TECHNICAL SPECIFICATIONS AND GAMING REGULATION

Testing, inspection procedures and certification auditing procedures were performed against certifiable sections of the following laws and regulations of the Hellenic Gaming Commission, as applicable to the components relevant to the products within scope:

- Number 79841 EE 2020/24.07.2020 (B 3266) Establishing a Technical Specifications (TS) Gaming Regulation for Organising and Conducting Online Games of Chance (as amended by Decision of the Minister of Finance number 58876 EE 2022/06.05.2022 (B '2232));
- Number 79835 EE 2020/24.07.2020 (GG B 3265) Establishing a Gaming Regulation for Organising and Conducting Online Games of Chance (as amended by Decision of the Minister of Finance number 67663 EE 2022/20.05.2022 (B '2483));
- Directive 1. Protocol Number: 4914, 18 May 2021.

The results of our assessment for conformity with the relevant requirements are detailed below. Different values used in the "Assessment Result" column is described as follows:

- > Compliant: The components within the assessment scope conform to the assessment standards and criteria.
- > Not Applicable: The requirement is not applicable for the assessment of conformance. Refer to comments for further information.
- > **Out of Scope**: The requirement for the assessment of conformance cannot be evaluated at this stage due to the current scope of testing/inspection or limitation of the test/inspection environment. Refer to comments for further information.
- **Non-Compliant:** Non-compliance with the regulatory requirement has been identified. Refer to comments for further information.
- > Compliant with Observation: The components within the assessment scope conform to the assessment standards and criteria with certain limitations or an area of moderate risk of potential non-compliance identified. Refer to comments for further information.

Table summarising compliance with the assessment standards and criteria:

Note: The scope of testing excludes compliance verification for third-party software that forms part of the online gambling technical system; however, appropriate reference has been made in the Annexures to third party provider's certification reports, as applicable.



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4.1. Technical Specifications

Requirement No.	Requirement Assessed	Assessment Result	Comments					
Chapter 2. Gaming	Chapter 2. Gaming Platform Requirements							
Article 5. Responsi	Article 5. Responsible Gambling							
5.1 Information	The Operator ensures that all information on Responsible Gambling is accessible from	Not Applicable	Testing limited to functions controlled by the					
	every page of the Website and/or any screen where a Game may be conducted.		supplier.					
Article 8. Client Sof	ftware							
8.1 General	The Client Software is any software that can be downloaded or installed on a Player Device.	Not Applicable	Information Only					
Statement								
8.2 Client	The Client Software and the Player Device:							
Software	a) Do not include the logic used to generate the outcome of each Game.	Compliant						
requirements	b) Do not conduct Gaming activities, if disconnected from the CIS.	Compliant						
	c) Do not store sensitive data or information required by the CIS.	Compliant						
Article 10. Incompl	ete Games							
10.1 Incomplete	A Game is incomplete when the outcome of the Game remains unresolved or when the	Not Applicable	Information Only					
Games	Player cannot clearly see the outcome. Incomplete Games may result from:							
	a) Loss of communication between the Gaming Platform and the Player Device.							
	b) Restart of the Gaming Platform.							
	c) Restart or malfunction of the Player Device.							
	d) Improper shutdown of the Client Software.							
	e) Command to deactivate the Game from the Gaming Platform while the Game is being							
	conducted.							



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Requirement No.	Requirement Assessed	Assessment Result	Comments
Requirement No. 10.2 Completion of Incomplete Games	Requirement Assessed The CIS shall provide a mechanism to the Players in order to complete an incomplete Game. An incomplete Game must be completed before a Player is allowed to participate in it again. a) If a Player has an incomplete Game, the CIS shall display the incomplete Game to be completed upon reconnection or every time a new Playing Session is activated. i) When Player input is not required for the Game to completed, the final outcome shall be displayed, as determined by the CIS and the Game rules, and the Player's Electronic Account shall be updated accordingly. ii) In the event of single-player multi-stage games, where Player input is required for the Game to be completed, the CIS shall transfer the Player to the Game status the moment before it was interrupted and allow them to complete the game. Note: Adding an optional bonus or feature, such as double-up or gamble, does not	Assessment Result Compliant	Comments
	convert a Game into a multi-stage Game. iii) In the event of multi-player games, the game play shall display the final outcome, as stipulated pursuant to the Game rules and/or the terms and conditions, and the Player's Electronic Account shall be updated accordingly. b) Wagers related to incomplete Games that may be continued shall be held by the CIS until the Game is completed. The Players' Electronic Accounts shall display any funds kept	Compliant	
	by incomplete Games.		
Article 14. Comme	rcial communication		
	Advertising or marketing material within the CIS, which is transmitted to the Player in any	manner, shall not:	
	a) Consist of improper of insulting graphics and/or sound, as specified by the Authority.	Out of Scope	Testing limited to functions controlled by the supplier.
	b) Overlap with the Game area or hinder a Game in progress.	Out of Scope	Testing limited to functions controlled by the supplier.
	c) Contain content that is inconsistent with the rules of the Game or the terms and conditions of the Website.	Out of Scope	Testing limited to functions controlled by the supplier.
	d) Specifically target Players who have been excluded from the Game.	Out of Scope	Testing limited to functions controlled by the supplier.



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Requirement No.	Requirement Assessed	Assessment Result	Comments			
·	The Operator must comply with the provisions of the Regulation and HGC decisions that regulate matters of Commercial Communication of Games of Chance. The use of the contact details used to set up the Player's Electronic Account for the purposes of Commercial Communication is prohibited without the Player's consent. The HGC may impose the immediate termination of any Commercial Communication action that violates the applicable provisions and the Regulation.	Out of Scope	Testing limited to functions controlled by the supplier.			
Chapter 3. Game R						
Article 17. Game re						
17.1 Introduction	This section of the document describes the technical requirements of the rules for conducting the Game and the corresponding Player interfaces.	Not Applicable	Information Only			
17.2 Player Interfa	ce					
17.2.1. Player Interface	Player Interface is the interface in the Client Software with which the Player interacts and we meet the following criteria:	hich is often referred	to as "game window". The Player interface must			
interruce.	a) Any change in size or overlap of the Player interface shall be designed accurately so that, after the change, the revised screen and the touchpoints/clickpoints are properly displayed.	Compliant				
	b) The functions of all the touchpoints/clickpoints depicted in the Player interface shall be clearly displayed at the touchpoint/clickpoint area and/or Game rules box. No touchpoints/clickpoints shall be hidden or without written documentation or keyboard commands in any area of the Player interface.	Compliant				
17.2.2. Game	- 					
Cycle	than one Game Cycle at a time on different Player interfaces.					
	a) Start of Game Cycle: i) Provided that the Player's Electronic Account has sufficient funds. ii) After the Player has specified the credit amount that they will use to wager on the Game.	Compliant				
	iii) After the Player has pressed the "play" button (or a similar entry point of the Game).b) The following components of the Game are deemed to be components of a Game Cycle:i) Games that activate a free Game feature and any subsequent free Games.	Compliant				



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Requirement No.	Requirement Assessed	Assessment Result	Comments
-	ii) "Second screen" bonus feature.		
	iii) Games where Players are called to choose (e.g. Draw Poker or Blackjack).		
	iv) Games where the rules allow additional Wagering during the Game Cycle (e.g.		
	Blackjack insurance).		
	v) Secondary Game features (e.g. double-up/Gamble).		
	c) A Game Cycle is considered completed when the final transfer to the Player's credit units	Compliant	
	meter is complete or when all credits used for Wagering are lost.		
17.3 General Game	Requirements		
17.3.1. Game	The following requirements apply to the Game information, the Design, the paytables and th	ne help screens, and inc	lude all written, graphics and audio information
information	provided to the Player, either directly via the game interface or by a Website accessible to	the Player, via a hype	rlink featured in a prominent area of the game
	interface.		
	a) The instructions for use of the Game and the Game Device shall be clearly stated and	Compliant	
	they shall not be misleading or unfair to the Player.	·	
	b) All statements and graphics in the Game information, the Design, the paytables and the	Compliant	
	help screens shall be accurate and not misleading.	·	
	c) All rules of the Game and paytable information shall be immediately available to the	Compliant	
	Player, at the Player interface, or accessible via a hyperlink at the Player interface, without		
	requiring a deposit or Wagering.		
	d) All rules of the Game and paytable information shall be sufficient to explain the entirety	Compliant	
	of the applicable rules and the manner in which the Player participates in every stage of		
	the Game.		
	e) Paytable information shall include every possible winning outcome, pattern, ranking	Compliant	
	and combination as well as their corresponding payouts, in a designated		
	denomination/currency. All displayed payouts shall be theoretically feasible.		
	f) Sufficient information shall be provided with regard to any prize payment setting, such	Not Applicable	Not applicable to this game type.
	as fees, commissions, graded commissions, etc., collected by the house.		
	g) If the Design contains instructions for the Game, which determine a maximum profit,	Compliant	
	then it will only be possible to win this amount in only one Game (including features or		
	other Game options).		



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	h) The Design shall contain the theoretical return to player (%RTP) and fully explain how it	Compliant	
	is calculated (i.e. minimum, maximum, average, etc.) and, thus, how it is implemented (i.e.		
	Wagering requirements). In Games that offer bonuses and require a base game bet, the		
	minimum theoretical %RTP of the additional bets must take into account the fact that a		
	base game bet must be wagered.		
	i) If the Design shows the actual %RTP, the number of games played and associated with	Compliant	
	this calculation shall be shown together with the period of time during which these games		
	took place.		
	j) If random/mystery prizes are offered, the maximum price that may be collected from	Not Applicable	No random/mystery prizes are offered in this
	them shall be stated. If this depends on the Wagers or any other factors, then this shall		
	be mentioned.		
	k) Multiple Wins.	Compliant	
	The Design shall clearly state the rules for prize payment, when multiple wins are possible.		
	i) When a pay line has more than one special winning patterns, a description of the patterns to be paid is required.		
	ii) If the Game supports multiple pay lines, the Design shall display a message stating that any wins in different pay lines are added, or the equivalent of that.		
	iii) If the Game supports scatters, the Design shall display a message stating that the		
	winnings of the scatter Game are added to the winnings of the pay lines, or something		
	similar to that, if this is the rule of the Game.		
	iv) The Design must clearly show how coinciding winning scatter combinations are		
	handled in relation to other scatter wins. For instance, the Design shall state whether		
	scatter symbol combinations pay all possible prizes or just the highest prize.		
	v) The Design shall clearly show how the coinciding Game outcomes shall be handled.		
	I) Extra lines.	Not Applicable	No extra line in this game.
	If Wagering on multiple lines is possible and it is not clear which reel positions are part of		The extra line in this game.
	the lines, then the additional lines shall be clearly displayed in the Design and bear the		
	appropriate markup. The additional lines shall either be displayed in the Design or		
	available for display in a help screen or permanently displayed in every screen of the		
	Game, at an area other than the actual reels.		



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	m) Multipliers. Where multiplier instructions appear in the Design, it shall be clear whether the multiplier applies or not.	Compliant	
	n) Symbols/Objects. All Game symbols shall clearly appear to the Player and shall not be misleading in any way. Game symbols shall maintain their shape throughout the Design, unless a picture is moving.	Compliant	
	o) Substitutes/Wilds. The Design shall clearly state which symbols may act as substitutes/wilds and the winning combinations they can be applied to.	Compliant	
	p) Scatter-type games. The Design shall clearly state which symbols may act as scatter and the winning combinations they can be applied to.	Compliant	
	q) Upcoming Wins. The Game shall not display upcoming wins, unless said display is accurate and mathematically proven or the Player has been shown their current progress (i.e. they have collected 2 out of 4 tokens).	Compliant	
	r) Card games. The requirements for Games that show cards drawn from a deck are the following: i) Games that use multiple decks of cards shall clearly state the number of card decks in play. ii) When the cards are removed from the deck, they shall not be put back, unless this is provided for in the Game rules. iii) The deck shall not be re-shuffled, unless this is provided for in the Game rules.	Not Applicable	Not applicable to this game type.
	s) Multi-Wager Games. The requirements for Multi-Wager Games are the following: i) Each Wager shall be clearly shown, so that the Player has absolutely no doubt in regard to the Wagers placed and the credit units per Wager.	Not Applicable	Not applicable to this game type.



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	ii) Each win shall appear to the Player in a manner that clearly associates the win with the corresponding Wager. In the event of wins associated with multiple Wagers, each winning Wager shall be shown in order.		
	t) Game information, the Design, the paytables and the help screens shall not show obscene or insulting information in any manner or form.	Compliant	
17.3.2. Displayed Information	The following Game information shall be clearly visible or easily accessible to the Player at	any time during a Play	ing Session:
	a) The name of the Game played.	Compliant	
	b) Limitations in the play or the Wager, such as any limits in the duration of the play, maximum win values, etc.	Compliant	
	c) The balance of the Player's Electronic Account in the current Playing Session.	Compliant	
	d) The current Wager amount. This strictly refers to the stage of the Game where the Player can add to their current Wager or place new Wagers.	Compliant	
	e) The current placement of every Wager (e.g. Roulette numbers, Blackjack insurance, etc.).	Compliant	
	f) The denomination of the bet for each Wager.	Compliant	
	g) The amount won in the last completed game (until the next game starts or the Wagering selections are modified).	Compliant	
	h) The Player's selections (e.g. Wager amount, lines played) in the last completed game (until the next game starts or the Wagering selections are modified).	Compliant	
	i) The initial selections of the Player shall be described (e.g. the choice of a runner in a horse race shall specify the name, the number and the expected payout). When the game starts, the Player's selections shall be clearly displayed on the screen (card held, hit, split, keno numbers etc.).	Compliant	



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	j) The winning amount for each Wager and the total amount won shall be displayed on the screen.	Compliant	
17.3.3. Forced	a) The Player shall not be forced to play a Game by just selecting it.	Compliant	
Game Play	b) The Player cannot start a new game play in the same Game window before all relevant counters of the CIS and all the relevant connections as well as the balance of the Player's Electronic Account have been updated.	Compliant	
	c) If an auto play mode is integrated, there shall be an option to deactivate this mode at any time during the game play.	Compliant	
17.3.4. Game Fairness	Games shall not create false expectations of better odds by presenting incidents or events incorrectly.	Compliant	
T dill liess	a) In Games designed to give the Player the feeling that he controls the outcome of the Game through his player skill, although this is not true (i.e. the outcome of the Game is random), the help screens shall display that the outcome of the Game depends on chance.	Compliant	
	b) The final outcome of each Game shall appear for an adequate period of time in order to allow the Player to be informed on the outcome of the Game.	Compliant	
17.3.5. Return to Player	The minimum theoretical return limits (expressed in percentage form) shall be determined by the applicable provisions. The requirements that specify how these percentages are calculated shall also be determined. The testing laboratory shall carry out an independent evaluation with regard to these requirements and policies.	Compliant	
17.3.7. Game Outcome	All key functions, including the Game outcome (and the return to Player) shall be generated by the Gaming Platform and are not contingent on the Player Device.	Compliant	
outcome	a) the Game outcome shall not be affected by the bandwidth, the link utilization, the bit error rate or other features of the communication channel between the Gaming Platform and the Player Device.	Compliant	
	b) The determining of events of chance that result in an amount of money are not affected or controlled by anything other than the numerical values generated in the appropriate manner by the certified Random Number Generator (RNG), if applicable, and in conjunction with the Game rules.	Compliant	



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	c) Any possible modification and/or combination of elements of the Game that produces	Compliant	
	outcomes of profit or loss is available for random selection at the start of each game,	·	
	unless otherwise stated in the Game.		
	d) The outcomes determined according to the resulting combinations based on the Game	Compliant	
	rules are applied immediately.		
	e) If an a priori sequence or Mapping of symbols or outcomes (i.e. the location of hidden	Not Applicable	No prior sequence or Mapping of symbols or
	objects inside a labyrinth) is required, the symbols or outcomes may not be readjusted, unless this is provided for in the Game rules.		outcomes.
	f) The Game displays the outcome in a clear and accurate manner without substituting the manner of displaying the outcome with alternative methods that present an unsuccessful outcome as "almost successful".	Compliant	
	g) Unless otherwise provided for in the Game rules, events of chance in Games are independent and not associated with other events within the Game or events in previous Games.	Compliant	
	h) For some types of Games, such as spinning reel games, the mathematical odds of a symbol to appear in a certain position for any Game outcome shall be fixed, unless the Player has been otherwise notified.	Compliant	
17.3.8. Simulation	When a Game depicts or implies that it involves a simulation of an actual device (e.g. spinr	ning of wheels, rolling of	of dices, flipping of coins, dealing of cards, etc.),
of physical devices	the simulation's behaviour follows the expected behaviour of the actual device, unless other	erwise stated in the Ga	me rules. This means that:
. ,	a) In Games with reality simulation, the simulation's visual representation corresponds to the features of the actual device.	Not Applicable	Applies to Blackjack, European Roulette only.
	b) In the simulation, the odds of each event that affects the Game outcome is equivalent to the corresponding odds of the actual device. For instance, the odds to hit a specific	Not Applicable	Applies to Blackjack, European Roulette only.
	number in the Roulette when the wheel has a single zero (0) and a double zero (00) is 1 in		
	38. The odds to draw a specific card or cards in poker are the same as the odds of the		
	regular (live) game.		
	c) If the Game simulates multiple actual devices which are normally independent of each other, each simulation is independent of the other simulations.	Not Applicable	Applies to Blackjack, European Roulette only.



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	d) If the Game simulates real devices with no memory of the previous events, the simulations' behaviour is independent of such previous behaviour in order to be non-adjustable and unpredictable in practice.	Not Applicable	Applies to Blackjack, European Roulette only.
17.3.9. Games with Time Dependencies	a) In Games where the outcome depends on the response time in a Game event, the Gaming Platform must inform the Player of any disadvantage related to the communication channel prior to offering the Game. Games that are unfair by nature shall not be authorised.	Not Applicable	Not applicable to this game type.
	b) The rules clearly describe the procedure to be followed if the Player is disconnected from the network server during a Game of this type (e.g. lost internet connection, PC crash, etc.).	Not Applicable	Not applicable to this game type.
17.4 Game/Bonus	Features		
17.4.1. Game / Bonus Features	This section refers to Games where one or more bonus features/prizes are awarded to the (or subsequent) animation screen and, unless otherwise provided to the Player, they must support bonuses, the Design must cover the following matters: a) The game clearly shows to the Player which Game rules apply to the current Game status. These rules are made available to the Player before the bonus Game starts, not	st be part of the theor	<u> </u>
	during the Game.b) The Game clearly shows to the Player the range of the amount of a potential win, the multiplier's range etc. that may be won in the bonus Game.	Compliant	
	c) For bonuses that do not randomly appear during a Game, adequate information is provided to the Player, showing the current status that leads to the triggering of the next bonus.	Compliant	
	d) If the Game requires the collection of various events/symbols in order to trigger a bonus, the number of events/symbols that have been collected must be displayed.	Compliant	
	e) The Game shall display rules for the cases where the right number of events/symbols is not collected, as applicable, when said events/symbols are required for triggering the bonus.	Compliant	
	f) If obtaining tokens can lead to free games, the number of possible lines and credits per line to be wagered during the free game plays is displayed.	Compliant	



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	g) If the bonus sequence consists of more than one feature games, the number of games	Not Applicable	The game bonus feature only consists of one
	remaining until the bonus sequence is displayed.		feature game.
	h) The Game must not adjust the likelihood of a bonus based on the history of prizes given	Compliant	
	in previous Games, unless the player has been clearly notified of this option prior to their	•	
	participation in the Game (e.g. the Games do not adjust their theoretical return to the		
	Player based on previous payouts).		
	i) If the bonus of a Game is triggered after collecting a certain number of events/symbols	Compliant	
	or combination of events/symbols of different nature in multiple Games, the odds of		
	acquiring new identical events/symbols are not reduced as the game progresses, unless		
	the player has been clearly notified of this capability prior to their participation in the		
	Game (e.g. for identical events/symbols, the last events/symbols required are not harder		
	to obtain than the previous events/symbols of this type).		
	j) If a Game allows the Player to hold one or more reels/cards/symbols for one or more	Not Applicable	There are no held reels featured I this game
	respins/draws, the held and non-held reels/cards/symbols are clearly displayed on the		
	screen, and the method for changing holds is clearly displayed to the Player.		
	k) If a bonus feature is offered where the Player must wager extra credits, the Player is	Not Applicable	Bonus features are not offered where extra
	given the choice to play or not to play the bonus game. A Player that chooses not to play		credits are wagered.
	the bonus game is directed to the base game in the status prior to the bonus. A player who chooses to play the bonus but does not have a sufficient credit balance to proceed, may:		
	i) Use the temporary winnings from the base game or previous stages of the bonus		
	game, if this is allowed by the Game rules.		
	ii) Authorise the transfer of funds to their Electronic Account.		
	iii) Combine options (i) and (ii), if this is allowed by the Game rules.		
17.4.2. Gamble	The following requirements apply to Games that offer a gamble feature (these Games may	Not Applicable	No Gamble Feature.
	also use terms such as Double-Up, Triple-Up or Take-or-Risk). The player is given a choice	140t Applicable	No Gamble Leature.
Feature	whether or not he wants to participate. Unless otherwise displayed to the Player, gamble		
	features have 100% theoretical RTP and do not affect the theoretical RTP of the total		
	paytable. In such games, the Design covers the following:		
	a) The prize limit (if any) and the maximum number of available Wagers.	Not Applicable	No Gamble Feature.



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Requirement No.	Requirement Assessed	Assessment Result	Comments
Requirement No.	b) When the gamble feature is stopped before the maximum number of available Wagers	Not Applicable	No Gamble Feature.
	is reached, the reason is clearly explained.		
	c) Any unusual game conditions of the Game, during which the gamble feature is not	Not Applicable	No Gamble Feature.
	available, are explained.		
	d) If a gamble feature offers multiplier options, the range of options and payouts is	Not Applicable	No Gamble Feature.
	explained to the Player.		
	e) The moment the Player chooses a multiplier, the selected multiplier is clearly displayed	Not Applicable	No Gamble Feature.
	on the screen.		
17.5 Peer to Peer (I	P2P) Communication		
17.5. Peer to	Bots are a type of artificial intelligence that may help a Player learn the environment and	Information Only	
Peer (P2P)	rules of the Game, and help them practice in the Game before participating in it.		
Communication			
Requirements			
17.5.1. Peer to Peer (P2P)	Peer to Peer (P2P) game rooms are rooms that allow players to play Games and participate together or against one another. In these rooms, the Operator does not normally have an active role in the game play (e.g. house banked gaming), but they usually provide the Games or the room for the Players, collecting a rake, a fee, or a percentage for providing the service. Unless otherwise specified in the Game rules, the systems offering P2P Games shall also do the following:	Not Applicable	Not applicable to this game type.
	a) Provide a mechanism for detecting and preventing Player collusion, artificial player software, unfair advantages, and ability of someone to influence the outcome of a Game or tournament.	Out of scope	a) Not applicable to this game type.
	b) Provide warnings on how Bots may affect a game play, so that the Players are able to make an informed decision on whether or not to participate. In addition, they provide instructions for reporting improper use of Bots in the Game. The terms and conditions of the Game must clearly state the above.	Not Applicable	Not applicable to this game type.
	c) Prevent authorised Players from sitting in more than one seats in each individual table.	Out of scope	c) Not applicable to this game type.
	d) Allow authorised Players to participate in a table where all authorised Players have been randomly selected.	Not Applicable	Not applicable to this game type.



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	e) Inform authorised Players of the period of time that every Player sits in a specific table.	Not Applicable	Not applicable to this game type.
	f) Do not use an artificial player software that acts as an authorised Player, with the exception of free play or training mode.	Not Applicable	Not applicable to this game type.
17.5.2.	The following requirements apply for the use of computerized players used in free play or	training mode.	
Computerized Players	a) The software may use Artificial Intelligence (AI) in the Game for demo mode, free play or training.	Not Applicable	Not applicable to this game type.
,	b) Use of Artificial Intelligence (AI) software is clearly explained in help menus.	Not Applicable	Not applicable to this game type.
	c) All computerized players must be clearly stated so that the real Players are aware of which Players are computerized.	Not Applicable	Not applicable to this game type.
17.5.3. Contests /	Organised events that allow the Player to either purchase or secure their participation in a	competitive Game aga	ainst other Players, the following rules apply:
Tournaments	a) In a tournament Game, Wagering is not carried out with real money but rather with special tournament points or chips, which have no actual cash value.	Not Applicable	Not applicable to this game type.
	 b) The rules of the Gaming contest/tournament are available to authorised Players through the Operator's Website. The rules must include at least the following: i) All terms, which the authorized Players must meet as requirements for entering and Wagering in the contest/tournament. ii) The terms pertaining to delayed arrivals or no-shows in the tournament, as well as terms pertaining to how auto-blind posting and/or initial entry purchase are handled. iii) Specific information on any single contest/tournament, including the amount of money available in the prize pool. iv) Amount distribution based on specific outcomes. v) The name of the organisation (or the persons) that conducted the contest/tournament on their behalf, or in collaboration with the Operator, as applicable. 	Not Applicable	Not applicable to this game type.
	c) The results of every contest/tournament are available on the Website so they can be reviewed by the participants. In addition to their posting on the Website, the results of each contest/tournament are also available following a request. Result recording includes the following: i) Event name.	Not Applicable	Not applicable to this game type.



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	ii) Event date(s).		
	iii) Total number of registrations.		
	iv) Amount of entry fees.		
	v) Total prize pool.		
	vi) Amount paid in each winning category.		
	Note: In free contests/tournaments (i.e. where the authorised Player does not pay an		
	entry fee), all information required above are recorded, with the exception of the number		
	of participants, the amount of entry fees and the total prize pool.		
17.6 Game Recall			
17.6.1. Player	The option to "replay last game" shall be provided, either by reproduction or by description.	. The replay shall clearl	y state that this is a replay of the entire previous
facing History	Game Cycle, and offer the following information (at minimum):		
	a) The date and time the Game started and/or ended.	Compliant	
	b) Information associated with the final outcome of the Game, which is displayed to the	Compliant	
	Player either by graphics or by a text message.		
	c) The total amount of money/credits of the Players at the beginning and/or at the end of	Compliant	
	the Game.		
	d) The total amount Wagered.	Compliant	
	e) The total amount of money/credits given for the prize (including any progressive jackpots).	Compliant	
	f) The results of the Players' selections that are involved in the outcome of the game.	Compliant	
	g) The results of any intermediate stages of the Game, (e.g. gambles or feature games).	Compliant	
	h) Promotional amounts of money (if any).	Not Applicable	Promotional amounts of money not offered
		, ,	in this game.
Chapter 6. Require	ments of Live Dealer Games		
Article 20. Require	ments for live dealer games		
20.1 General requi			



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Requirement No.	Requirement Assessed	Assessment Result	Comments
20.1.1 Definition	Live dealer games using the internet are limited to table games run by a real dealer using actual gaming equipment, with a video and audio feed sent to all remote Players along with instructions for the use of streaming, narrowcast, broadcast or other technology. NOTE: Player here means a remote Player only.	Not Applicable	Information Only
20.1.2	Real-time information shall be provided to the Player, which include every available inform	nation of the Game and	d the equivalent to the respective online Game.
Displayed	This information includes:		
Information	a) Date and time.	Not Applicable	Not applicable to this game type.
	b) Table number and location.	Not Applicable	Not applicable to this game type.
	c) Table minimum and maximum Wagers.	Not Applicable	Not applicable to this game type.
	d) Number of decks used, as appropriate.	Not Applicable	Not applicable to this game type.
	e) The amount of the Wager.	Not Applicable	Not applicable to this game type.
	f) The outcome of the Game.	Not Applicable	Not applicable to this game type.
	g) Vigorish amount, if applicable.	Not Applicable	Not applicable to this game type.
	h) Payout odds, as appropriate.	Not Applicable	Not applicable to this game type.
	i) Amounts won or lost.	Not Applicable	Not applicable to this game type.
20.1.3	In case a remote Player does not complete, for any reason, an action that is required for th	e Game to continue w	ithin the specified time:
Incomplete Games	a) The Gaming Platform shall complete the Game on behalf of the Player.	Not Applicable	Not applicable to this game type.
	b) The Game shall be completed using the optimum strategy for this specific Game.	Not Applicable	Not applicable to this game type.
	c) The Player must not enter again the specific instance of a Game where the Gaming	Not Applicable	Not applicable to this game type.
	Platform has undertaken to complete the game on behalf of the Player.		5 //
	d) Any winnings that result from the Game shall be credited to the Player's Electronic Account.	Not Applicable	Not applicable to this game type.
	e) Any loss derived from the Game shall be withheld according to the Game rules.	Not Applicable	Not applicable to this game type.



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	f) The results of the Game shall be available to the Player and a reference shall be made to which decisions were made by the Gaming Platform on behalf of the Player.	Not Applicable	Not applicable to this game type.
	g) The other Players in the Game shall be allowed to complete their Games (unless they are not able to or if they do not take their turn).	Not Applicable	Not applicable to this game type.
20.1.4 Win notification	If the Player who wins is using an internet interface/gateway, they shall be notified of the win directly through the Player's Electronic Account, including the amount won, in due course, after the Game is completed.	Not Applicable	Not applicable to this game type.
20.1.5 Player Application Requirements	Player applications must have sufficient resources to meet the minimum system requirements laid down by the live dealer system and as advertised to the remote Player.	Not Applicable	Not applicable to this game type.
20.2 Betting by Inte	ernet Interface		
20.2.1 General Statement	The following requirements apply only to live dealer games via an internet interface or for Games which effectively use an effective internet interface or gateway to an existing traditional/land-based Game which already operates in a live environment.	Not Applicable	Information Only
20.2.2 Game	The following information must be readily available via the Game's internet interface or ga	teway during the entir	e Play Session as appropriate:
fairness	NOTE: Nothing in this text excludes the possibility of applying promotions to Games whe traditional/land-based Games.	re the Player is conne	cted through an internet interface/gateway or
	a) Sufficient information in order to determine the specific selected Game.	Not Applicable	Not applicable to this game type.
	b) The progress of the Game and the payout rules do not rely on sound to convey their meaning.	Not Applicable	Not applicable to this game type.
	c) Every charge imposed on the Player, such as fees, vigorish.	Not Applicable	Not applicable to this game type.
	d) The rules that describe the interruption handling procedures of a Game, which are caused by discontinuity of the flow of data, picture and sound from the network server during a Game (e.g. internet connection breakdown or malfunction of the Wagering terminal).	Not Applicable	Not applicable to this game type.
	e) Players must be notified of every Wagering chance when watching an event live (e.g. betting on the game) that this live transmission might be subject to delays or interruption.	Not Applicable	Not applicable to this game type.



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	When a delay is obvious or created by the system, the size of the delay shall be notified to		
	the Player.		
	f) The rules, the Design and the functionality of the Game, which are made available to the	Not Applicable	Not applicable to this game type.
	Player using the internet interface/gateway, do not include fewer details than the ones		
	made available to the Player that uses the traditional/land-based game, as appropriate.		
	g) Players that participate in the Game (or wager on a future event) using the internet	Not Applicable	Not applicable to this game type.
	interface/gateway have the same chances to win or lose as the Players that use a		
	traditional/land-based Game.		
Article 21. Electron	nic Card Shuffler Requirements		
21.1 Random Num	ber Generator		
21.1.1 General	The Random Number Generator (RNG) and mechanical means ensure that the results of	Not Applicable	RNG not utilised for Live Dealer Games
requirements	card games are random. The results:		purposes.
requirements	a) Are statistically independent.		parposes.
	b) Comply with the desired random distribution.		
	c) Successfully pass several recognised statistical tests.		
	d) Are not predictable.		
21.1.2 Applied	The assessment laboratory uses several recognised tests to determine whether the	Not Applicable	RNG not utilised for Live Dealer Games
Tests	random values generated by the random number generator pass or fail the desired		purposes.
	confidence limit of 99%. These tests include, but are not limited to, the following:		The first state of the first sta
	a) x ² Test.		
	b) Equidistribution (frequency) Test.		
	c) Vacuum Testing.		
	d) Overlapping Test.		
	e) Poker Test.		
	f) Ticket Collector Test.		
	g) Transposition Test.		
	h) Kolmogorov-Smirnov Test.		
	i) Sequentiality Criterion Tests.		
	j) Statistical Sequence Test.		
	k) Flow Tests (appearance patterns must not be recurring).		



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	I) Interactive Correlation Test. m) Serial correlation power test and serial correlation degree (the results must be independent of the previous Game). n) Sequences Test. o) Poisson Distribution		
21.1.3 RNG background activity	The RNG must be continuously cycled in the background between Games and during single-speed Games; it must not be possible for said to be timed by the player.	Not Applicable	RNG not utilised for Live Dealer Games purposes.
21.1.4 RNG Seed Production	The first seed shall be randomly determined by an uncontrolled event. After each Game, there shall be a random change in the RNG process (new seed, random timer, delay etc.). It shall be certified that the RNG does not start at the same value every time. Alternatively, not using a random seed is allowed. However, the manufacturer ensures that random changes are not synced.	Not Applicable	RNG not utilised for Live Dealer Games purposes.
21.1.5 Scalable algorithms	 a) If a random number, whose range is shorter than the one provided by the RNG, is required for some purpose within the device, the scaling method (i.e. conversion of the number to the lower range), shall be designed in such a way that all numbers inside the lowest range are equally probable. b) If a certain random number selected is outside the range of equal distribution of the scaling values, it may be rejected and the next in sequence for the purpose of scaling shall be selected. 	Not Applicable	RNG not utilised for Live Dealer Games purposes.
21.10 Device functi	ionality		
21.10.1 Shuffler functionality	Card shufflers must be designed in such a way so that: a) They ensure that the outcome of the game is not affected, irrespective of the sequence the cards enter the shuffler. b) Their operation cannot be hindered or interrupted without detecting the cause, with the exception of power failure. c) During its operation, the shuffler must be able to deal the cards without marking, scratching or scraping any of them or causing any alteration to the cards, rendering them recognisable to the Player.	Not Applicable	RNG not utilised for Live Dealer Games purposes.



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	d) The shuffler must not give away any kind of information with regard to the game that is being played, which may result in: i) Predicting the outcome of the Game. ii) Counting the cards that have been played and the cards remaining to be played. iii) Calculating the probability of an event occurrence in regard to the Game. iv) Developing a strategy for Wagering or playing behaviour in the Game. e) The shuffler may use auxiliary devices that help meet the above requirements. Auxiliary devices shall not affect the fairness of the shuffler's operation. NOTE: Auxiliary devices operate in accordance with the manufacturer's design and operation specifications.		
Chapter 9. Randon	n Number Generator		
Article 25. Random	n Number Generator Features		
25.1 Random Number Generator General Requirements	At the time of submission, the random number generator (RNG) must be solid in terms of encryption. When more than one instances of a random number generator are used in the CIS, each instance must be assessed and certified separately. When the instances are identical but require a different implementation in the Game/application, each implementation must be assessed and certified separately. Any results of the random number generator that are used to determine a Game's symbol/outcome must prove, through data analysis and source code, that they: a) Are statistically independent. b) Are fairly distributed (within statistically expected limits) in their range. c) Have successfully passed several recognised statistical tests. d) Are cryptographically strong.	Compliant	Please refer to RNG report: RN-385-NGT-21-01-484
25.2 Tests Performed	The independent certification laboratory may use several recognised application tests to determine whether the random values generated by the random number generator pass or fail the desired confidence limit of 99%. These tests may include, but are not limited to, the following: a) x² Test. b) Equidistribution (frequency) Test. c) Vacuum Testing.	Compliant	Please refer to RNG report: RN-385-NGT-21-01-484



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	d) Overlapping Test.		
	e) Poker Test.		
	f) Ticket Collector Test.		
	g) Transposition Test.		
	h) Kolmogorov-Smirnov Test.		
	i) Sequentiality Criterion Tests.		
	j) Statistical Sequence Test.		
	k) Flow Tests (appearance patterns must not be recurring).		
	I) Interactive Correlation Test.		
	m) Serial correlation power test and serial correlation degree (the results must be		
	independent of the previous Game).		
	n) Sequences Test.		
	o) Poisson Distribution.		
	NOTE: The independent certification laboratory shall choose the appropriate tests,		
	depending on the RNG under examination.		
25.3 Scaling	The scaling method must not compromise the encryption power of the random number	Compliant	Please refer to RNG report: RN-385-NGT-21-
_	generator. Also, the scaling method shall safeguard the distribution of scaled values. For		01-484
	instance, if a 32-bit random number generator with a range of the total integers of the		
	closed space [0, 232-1] had to be scaled to the range of the total integers of the closed		
	space [1, 6] so that the scaled values may be used to simulate the roll of a six-sided dice,		
	then each integer of the range scale should theoretically appear at the same frequency.		
	In the example provided, if the theoretical frequency is not the same for each value, then		
	the scaling method is considered biased. Therefore, the bias of a compliant scaling method		
	must be equal to zero.		
25.4 Hardware-	Due to their nature, the performance of a hardware-based random number generator (RNG)	Not Applicable	This is a software based RNG.
based Random	may deteriorate over time. Failure of the hardware-based RNG might have serious		
Number	consequences for the Game/application, e.g. Games may become predictable or distributed		
	unfairly. Therefore, if a hardware-based RNG is used, real-time dynamic/active monitoring of		
Generator	its output must be in place, with a sample size that is large enough to allow several statistically		
	strong tests so that the Game is deactivated when an error is detected in an output check.		



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Requirement No.	Requirement Assessed	Assessment Result	Comments
25.5 Software-base	ed Random Number Generator		
The following requi	rements are applicable only to a software-based random number generator (RNG).		
25.5.1 Period	The RNG Period, in conjunction with the application methods of RNG results, must be long enough to ensure that all independent combinations/variations of the outcome of the Games are possible for said Games/applications.	Compliant	Please refer to RNG report: RN-385-NGT-21-01-484
25.5.2 Seeding / re-seeding	Seeding/Re-seeding methods must ensure that every value of start-initialization seeds of the random number generator (RNG) is determined in a manner that does not compromise the cryptographic security of the random number generator.	Compliant	Please refer to RNG report: RN-385-NGT-21-01-484
Chapter 10. Progre	ssive Jackpot		
Article 26. Progress	sive Jackpot Requirements		
26.1 Introduction	The Progressive Feature is a progressively increasing prize, which is based on the ratio of the credit units wagered/won. This includes prizes awarded based on criteria different than a winning outcome in the Game, such as the "Mystery Jackpot". However, it does not include non-configurable, growing prizes that result from bonus features, which are part of the Game's paytable (Theoretical %RTP).	Not Applicable	No Progressive Jackpot in this game.
26.2 Progressive Ja	ckpot Design and Function		
26.2.1 Progressive	The following principles must be applied to a Progressive Jackpot:		
Jackpot fairness	a) Every Player who plays Progressive Jackpot Games must be informed of the actions that will enable them to win the Progressive Jackpot.	Not Applicable	No Progressive Jackpot in this game.
	b) If the contributions from a Progressive Jackpot are part of the %RTP calculation, these contributions must not be treated as revenue. If a cap is set on a Progressive Jackpot, once this cap has been reached, all additional contributions shall be credited to a diversion pool. The minimum payout to the Player must be reached irrespective of the number of betting units that are calculated.	Not Applicable	No Progressive Jackpot in this game.
	c) The rules of the Game must include the manner in which the Progressive Jackpot is funded and determined.	Not Applicable	No Progressive Jackpot in this game.



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	d) If a Player has to Wager a minimum amount in order to win a Progressive Jackpot, then	Not Applicable	No Progressive Jackpot in this game.
	the base game (without the Progressive Jackpot) must meet the requirement of minimum		
	payout to the Player.		
	e) The current amount of the Progressive Jackpot must be displayed on the devices of the	Not Applicable	No Progressive Jackpot in this game.
	Players that wager in such Game. This screen must be updated on all Players' devices at		
	least every 30 seconds.		
	NOTE: It is acceptable that, depending on the means, communication delays vary and are		
	beyond the knowledge or control of the Operator. Server-to-Player-Device type of delays		
	shall vary from Player to Player and from message to message.		
	f) The rules of the Game must inform the Players about the imperfections of the means of communication for the Game and how this affects them.	Not Applicable	No Progressive Jackpot in this game.
	g) The rules of the Game must inform the Players about maximum prizes and/or time limits	Not Applicable	No Progressive Jackpot in this game.
	that may apply to each Progressive Jackpot.		
	h) For progressive jackpots that offer multiple prize levels, if a particular combination that	Not Applicable	No Progressive Jackpot in this game.
	activates payment of the highest prize is won, the Player must always be paid the highest		
	amount. This may occur when a winning combination can match more than one of the		
	combinations available in the paytable (i.e. Flush is a type of Straight Flush and a Straight		
	Flush is a type of Royal Flush). Therefore, there may be cases where the Progressive		
	Jackpot level shall be swapped to ensure that the Player receives the highest possible		
	amount based on all the combinations that determine it.		
	i) If multiple progressive jackpots occur at approximately the same time and there is no	Not Applicable	No Progressive Jackpot in this game.
	way for anyone to know which jackpot happened first, it must be ensured that these "hits"		
	are considered simultaneous wins. Prize payments for simultaneous wins must be made		
	in accordance with the rules of the Game. The rules of the Game must include information		
	about this case.		
6.2.2 Slave	When a "Master Controller" uses "Slave Controllers" to control a Progressive Jackpot, the	Not Applicable	No Progressive Jackpot in this game.
rogressive	following requirements apply:		
	a) All "Slave Controllers" must be synchronised with the "Master Controller".	Not Applicable	No Progressive Jackpot in this game.
	b) The "Master Controller" must be synchronised with the CIS.	Not Applicable	No Progressive Jackpot in this game.



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Requirement No.	Requirement Assessed	Assessment Result	Comments
Jackpot controllers	c) Progressive Jackpot win events must be time-stamped and the Progressive Jackpot controller must ensure that "hits" recorded with a slight time difference shall be considered simultaneous wins. Payment of prizes for simultaneous wins must made in accordance with the rules of the Game.	Not Applicable	No Progressive Jackpot in this game.
	d) The minimum time "window" (Progressive Jackpot Reset Period) cannot be shorter than the maximum period of time required to: i) Register that a Progressive Jackpot has been won. ii) Announce the win on the screens of the devices of all Players participating in an active session. iii) Reset the Progressive Jackpot meters.	Not Applicable	No Progressive Jackpot in this game.
	e) In case a Progressive Jackpot that is determined by increasing the Wagers of individual Players is supported, the process of receiving the increases from all Players' devices, whether connected to the "Master Controller" or the "Slave Controller", must be fair.	Not Applicable	No Progressive Jackpot in this game.
26.2.3 Progressive	In the event of a jackpot win, the following requirements must be met:		
Jackpot Win Notifications	a) A winning Player must be notified of the win of a Progressive Jackpot until the end of the game in progress.	Not Applicable	No Progressive Jackpot in this game.
	b) The information on the payout of a Progressive Jackpot must be provided to every device of every Player that participates in the Progressive Jackpot at the time of the win, in a manner that is understood by the Player.	Not Applicable	No Progressive Jackpot in this game.
	c) The amount of the Progressive Jackpot, as established after its payout, must be displayed on all Players' devices that participate in the jackpot at the time of the payout.	Not Applicable	No Progressive Jackpot in this game.
26.2.4 Changes to	For the configuration of progressive jackpots, the following requirements apply:		
the Progressive Jackpot Parameter	a) When a Progressive Jackpot has started, any changes in its parameters shall become effective after the win of the current Progressive Jackpot. These are the "pending" parameters.	Not Applicable	No Progressive Jackpot in this game.
Taranicter	b) A Progressive Mystery jackpot that uses a Hidden Progressive Jackpot amount to determine the Progressive Jackpot win must not change the amount of the Hidden Progressive Jackpot when the parameters change, if the Progressive Jackpot is active (i.e. in the event that contributions from a Progressive Jackpot are added to it).	Not Applicable	No Progressive Jackpot in this game.



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	c) The CIS must provide a way to display current and pending Progressive Jackpot parameters.	Not Applicable	No Progressive Jackpot in this game.
	d) The CIS must record the values of every Progressive Jackpot meter as well as all current or pending Progressive Jackpot parameters.	Not Applicable	No Progressive Jackpot in this game.
26.2.5 Partial Progressive Jackpot Redirection	Diversion Pool schemes where part of the progressive jackpots contributions is redirected to another pool are acceptable, so that when the Progressive Jackpot is won, the diversion pool shall be added to the seed of the next Progressive Jackpot.	Not Applicable	No Progressive Jackpot in this game.
26.2.6 Progressive	If a Progressive Jackpot must be closed (e.g. malfunction, loss of connectivity, unexpected	shutdown), the followi	ing requirements shall apply:
Jackpot Shutdown	a) The Players must be given a clear indication that the Progressive Jackpot is not working (e.g. display "jackpot closed" in the Player Device).	Not Applicable	No Progressive Jackpot in this game.
	b) It must not be possible to win a Progressive Jackpot while it is in shutdown mode.	Not Applicable	No Progressive Jackpot in this game.
	c) If the Progressive Jackpot operates in conjunction with another Game (i.e. base Game) and the Return to Player requirement only happens when Progressive Jackpot contributions are included, the other Game may only be offered when the Progressive Jackpot is available.	Not Applicable	No Progressive Jackpot in this game.
	d) The activation of the Progressive Jackpot from interrupted mode must activate the Progressive Jackpot with the exact same parameters, including the value of the Progressive Jackpot and the hidden win amount for the Progressive Mystery Jackpot, precisely as it was before the interruption.	Not Applicable	No Progressive Jackpot in this game.
26.2.7 Progressive	To activate the recovery of the current value of Progressive Jackpot amounts, in the event of	of malfunction of a CIS s	subsystem or the Progressive Jackpot controller,
Jackpot Recovery	the following must happen:		
	a) The current value of the Progressive Jackpot amount must be stored in at least two physically separate devices, or	Not Applicable	No Progressive Jackpot in this game.
	b) The current value of the Progressive Jackpot amount must be able to be accurately calculated by other available measurement information that should not be stored in the same CIS subsystems as the Progressive Jackpot amount.	Not Applicable	No Progressive Jackpot in this game.



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	In any case, all Progressive Jackpot winners that were selected must be paid as soon as the	Not Applicable	No Progressive Jackpot in this game.
	value in recovered.		·
	2. This decision shall enter into force upon its publication in the Government Gazette.		
	This decision is to be published to the Government Gazette.		



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4.2. Gaming Regulation

Requirement No.	Requirement Assessed	Assessment Result	Comments
Article 12. Other (·		
12.1	12.1. The Games that are permitted to be played under the type 2 License are as follows: a. Casino games, poker and/or variants thereof, which are conducted in a live	Compliant	
	broadcast, in a Special Area (studio), with a live dealer and the outcome of which is not exported from a Random Number Generator.		
	b. Casino games, poker and/or its variants, whose outcome is extracted by a Random Number Generator. The maximum Wager in the other online games when they are conducted using a random number generator (RNG) is twenty (20) euros. c. Poker and/or peer to peer variations, either poker cash games or in the form of		
40.0	poker tournaments.		
12.3	12.3. The maximum amount of winnings in the Games of case (a), paragraph 12.1 is determined by the License Holder per Game or Group of Games and is a multiple of the minimum Game Participation fee.	Not Applicable	Not Applicable to this game type
12.4	12.4. The maximum amount of profit in the Games of case b of paragraph 12.1 may not exceed one hundred forty thousand euros (EUR 140,000) per Game Cycle, including the value of all the additional Game rewards allowed to be awarded, with the exception of any Jackpot award, in accordance with the provisions of the Regulation.	Compliant	
12.5	12.5. The maximum amount of winnings in the Games of case (c), paragraph 12.1 is determined by the License Holder per Game or Group of Games or organisation and in accordance with the terms and conditions of Participation.	Not Applicable	Not Applicable to this game type
Article 13. Jackpot			
13.6	13.6. The License Holder ensures that the maximum reward that can be awarded by a Jackpot Function cannot exceed the amount of five hundred thousand (500,000) euros. Any exceeding of the above amount that has been collected based on the Participation of the Players, is obligatorily transferred to another Jackpot Function.	Not Applicable	No Progressive Jackpot in this game.



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Requirement No.	Requirement Assessed	Assessment Result	Comments
.3.7	13.7. In any case of reduction of the amount accumulated based on the	Not Applicable	No Progressive Jackpot in this game.
	Participation of the Players or removal of the Jackpot Function, the amount of the		
	decrease, or the amount accumulated based on the Participation of the Players at		
	the time of the removal, must be transferred to another Jackpot Function, within		
	three (3) months of the date of the reduction or removal.		
Article 16. Particip	ation in The Games		
16.1	16.1. Participation in the Games is the result of free and independent personal	Compliant	
	choice and takes place without provocation or motivation (unstimulated		
	gambling). The License Holder provides Players with information about the rules		
	of the Games, the chances of winning each game, as well as information about		
	where they can turn for help in case of addiction. The relevant information must		
	be made available by the License Holder, on the License Holder's Website, as well		
	as by any other appropriate means.		
16.2	16.2. License Holder provides information to the Player about:	Compliant	
	a. His Participation in the Games, in a way that he makes decisions, having full		
	knowledge of the rules of the Games that he chooses to participate in.		
	b. The dangers he may face from being overexposed to the Games, such as losing		
	money and addiction. In this context, during the conduct of games, the result of		
	which is extracted from a random number generator (RNG), Responsible Gambling		
	messages must be displayed on the main screen, in such a way and for such a		
	period of time, that are perceived as interference in the conduct of the Game and		
	are adequately received by the Player.		
	c. Existing structures that provide help and support to addicted Players and their		
	families.		
16.3	16.3. It is forbidden for anyone to participate in the Games via surrogates.	Compliant	
16.4	16.4. A new game cycle cannot be started before two (2) seconds have elapsed	Compliant	
	from the start of the previous cycle. The limitation of this paragraph does not apply		
	to Poker Games and/or variations of the same peer to peer, either poker cash		
	games or in the form of poker tournaments.		
Article 17. Game G	Guide		



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Requirement No.	Requirement Assessed	Assessment Result	Comments
17.1	17.1. On its Website, the License Holder shall post a Game Guide, in Greek, which	Compliant	Publication of these rules on the License Holder
	shall include, per Game or Group of Games, at least the description of the Game		website is not managed by the supplier.
	or Games, the categories of success (paytable), the minimum and maximum		,
	amount of participation, the types of bets offered, the manner of determining the		
	result, possible multipliers, etc.		



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4.3. Directive 1. Protocol Number: 4914, 18 May 2021

Requirement No.	Requirement Assessed	Assessment Result	Comments			
Article 12. Other Or	Article 12. Other Online Games					
6.4 Games being played	This section contains the Games, which are conducted by the Holder under the validity of the License. The Licensee informs the interested parties that, for the provision of the games, he cooperates with Manufacturers who have been registered in the relevant register, which is kept by the H.G.C. The Licensee is suggested that it maintain s hyperlinks referring to the websites of the Manufacturers with whom it cooperates. The Holder clarifies to the interested party that the special rules for conducting each Game or category group of Games that he conducts, are included in the Game Guide.	Out of scope	Testing is limited to functions controlled by the supplier.			
	Traits such as the environment for organizing and conducting betting events, the rules of the sport, the rules of the game, the categories of success, the chances of winning, the way of winning, the minimum and maximum amount of participation, where it is applied, the odds of the multipliers, the means to determine the betting odds, the commission that may be withheld by the Holder for the participation, the way of calculating the tax on the winnings for a game or Group of Games, the terms of the jackpot's operation, the way of display, etc., are information, which are described in the Game Guide.	Out of scope	Testing is limited to functions controlled by the supplier.			
	The interested party is informed that by participating to the Game the Player accepts the Game Guide unconditionally and he is referred to the Game Guides posted on the Website, per Game or category group of Games.	Out of scope	Testing is limited to functions controlled by the supplier.			
6.5.5 Jackpot function	1. A Player, who wins, must be informed of the odds of a Progressive Jackpot Mode being awarded continuously until the end of the ongoing Game.	Not Applicable	No Progressive Jackpot in this game.			
6.5.5 Jackpot function	2. The information on the award of a Progressive Jackpot Mode must be provided to all Players, who participate in this Mode at the time of the win in a manner comprehensible to the Player and regardless of the means used by each Player to access the Online Account of.	Not Applicable	No Progressive Jackpot in this game.			



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Requirement No.	Requirement Assessed	Assessment Result	Comments
	Electronic Account.		
6.5.5 Jackpot	· · · · · · · · · · · · · · · · · · ·	Not Applicable	No Progressive Jackpot in this game.
function	after the prize is awarded, must be provided to all Players, who participate in the		
	Jackpot Mode at this time, regardless of the medium used by each Player to access his		
6.5.5 Jackpot		Out of scope	Not in scope of testing. Please refer to platform report: RN-385-NGT-21-01-484
function	malfunction, loss of connectivity, unexpected termination), a clear indication must		
	be given to the Players that the Progressive Jackpot Mode is not operating and it		
	may not be claimed while being under termination proceedings		
	5. Reactivating a Progressive Jackpot Mode from stop mode must activate the		
	Mode with exactly the same parameters as it was before the stop.		
	6. If the Progressive Jackpot Mode works in conjunction with another Game (e.g		
	base game) and the requirement of return to the Player is met only when		
	Progressive Jackpot contributions are included, the other Game is only available		
	as soon as the Progressive Jackpot is available.		
6.5.5 Jackpot	7. Through the Game Guide the Player is informed about the Jackpot Functions and	Not Applicable	No Progressive Jackpot in this game.
function	in the case of Progressive Jackpot (Progressive Jackpot), at least about:		
	aa. The maximum prizes and or time limits that may exist for Progressive Jackpot		
	Features.		
	bb. The way in which the Progressive Jackpot is financed and determined.		
	cc. Whether there is a minimum entry fee for a Player to win a Progressive Jackpot		
	Mode.		
	dd. The rules that apply to simultaneous wins and cash outs, in the event that		
	multiple wins of a Progressive Jackpot Mode occur at approximately the same time		
	and there is no way to know which Jackpot happened first.		