

eCOGRA LIMITED

HELLENIC GAMING COMMISSION

GAME CERTIFICATE

FOR

HGMT LTD

REPORT REFERENCE NUMBER:**e226552HCKGRCM**

REPORT ISSUE DATE: **06 MAY 2022**

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TABLE OF CONTENTS

1. GENERAL INFORMATION 4
2. OVERVIEW OF THE GAMING SYSTEM COMPONENTS 6
2.1. Game Overview 6
2.2. Percentage Return to Player ('RTP') 6
2.3. Game Critical Software Components 7
2.4. Random Number Generator 7
3. ASSESSMENT AND EVALUATION METHODS APPLIED 8
3.1. Games and Gaming Technology 8
4. ASSESSMENT RESULTS – TECHNICAL SPECIFICATIONS AND GAMING REGULATION 9
4.1. Technical Specifications 10
4.2. Gaming Regulation 41
4.3. Directive 1. Protocol Number: 4914, 18 May 2021 44

1. General Information

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Independent certification laboratory legal form:	Private Company
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Assessment standards and criteria:	Number 79841 ΕΞ 2020/24.07.2020 (B 3266) - Establishing a Technical Specifications (TS) Gaming Regulation for Organising and Conducting Online Games of Chance. Number 79835 ΕΞ 2020/24.07.2020 (GG B 3265) - Establishing a Gaming Regulation for Organising and Conducting Online Games of Chance. Directive 1. Protocol Number: 4914, 18 May 2021
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Dates of assessment:	18 April 2022 - 03 May 2022
Place of testing:	Pre-Production Environment emulating The Live Environment.
Report type:	Game Certificate

REPORT REFERENCE NUMBER:	e226552HCKGRCM
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ASSESSMENT RESULT:	Compliant

INDEPENDENT CERTIFICATION LABORATORY REPORT APPROVAL:

Bradley Khoury
Chief Technical Officer
eCOGRA

2. OVERVIEW OF THE GAMING SYSTEM COMPONENTS

Game or gaming technology (including RNG)

Please note that this is an initial certification conducted over Buffalo Stack'n'Sync and therefore this game certificate does not supersede any previous certifications.

2.1. Game Overview

Game Name	Game ID	Version	Platform	Game Type
Buffalo Stack'n'Sync	1176	1.0.0	HTML5-Desktop; HTML5-Mobile	Slot
	1177			
	1178			
	1179			

Game Description: The great buffalo, soaring eagles and grass swaying in the wind. These are the iconic themes of the Great Plains of North America, the essence of which is captured in this re-imagining of the classic Vegas slot. Buffalo Stack'n'Sync™ is a 5x4 grid slot with two awesome bonus games and a max win of up to 10,000x!

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

- Desktop Channel - Windows 10 Pro, Google Chrome Browser, Version 100.0.4896.127 (Official Build) (64-bit)
- Mobile Channel - Samsung A8, Android 11, SM-X205 Build/RP1A.200720.012, Google Chrome Browser, Version 100.0.4896.127

2.2. Percentage Return to Player ('RTP')

Theoretical RTP %	eCOGRA RTP % Recalculation
96.36%	97.17%
94.38%	94.07%
92.37%	92.22%
88.46%	89.42%

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.

2.3. Game Critical Software Components

The following critical software elements formed part of the assessment scope:

Software Element Name	Version Date	Version Number	Digital Signature (SHA#1 Hash)
HacksawGaming.Games.ReactionsSlotMachine.dll	N/A	N/A	67F263C2DD2F801B4207010EE145D2C77D7E39B8
HacksawGaming.Games.ReactionsSlotMachine.BuffaloStackNSync.dll	N/A	N/A	8EA0D8E956854A0530A1B91C70A9585FC8D5BA97

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 e217726HCKGRC issued by eCOGRA on 11 November 2021 for further details of testing conducted over RNG.

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 certification.
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.

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 ΕΞ 2020/24.07.2020 (B 3266) - Establishing a Technical Specifications (TS) Gaming Regulation for Organising and Conducting Online Games of Chance; and
- Number 79835 ΕΞ 2020/24.07.2020 (GG B 3265) - Establishing a Gaming Regulation for Organising and Conducting Online Games of Chance
- 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.

4.1. Technical Specifications

Requirement No.	Requirement Assessed	Assessment Result	Comments
Chapter 2. Gaming Platform Requirements			
Article 5. Responsible Gambling			
5.1 Information	The Operator ensures that all information on Responsible Gambling is accessible from every page of the Website and/or any screen where a Game may be conducted.	Not Applicable	
Article 8. Client Software			
8.1 General Statement	The Client Software is any software that can be downloaded or installed on a Player Device.	Not Applicable	Information Only.
8.2 Client Software requirements	The Client Software and the Player Device:		
	a) Do not include the logic used to generate the outcome of each Game.	Compliant	
	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. Incomplete Games			
10.1 Incomplete Games	A Game is incomplete when the outcome of the Game remains unresolved or when the 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.	Not Applicable	Information Only.

Requirement No.	Requirement Assessed	Assessment Result	Comments
10.2 Completion of Incomplete Games	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 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.	Compliant	Testing limited to functions controlled by the supplier.
	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 by incomplete Games.	Not Applicable	Testing limited to functions controlled by the supplier.

Article 14. Commercial 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.
	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 Requirements			
Article 17. Game requirements			
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 Interface			
17.2.1. Player Interface	Player Interface is the interface in the Client Software with which the Player interacts and which is often referred to as "game window". The Player interface must meet the following criteria:		
	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	

Requirement No.	Requirement Assessed	Assessment Result	Comments
17.2.2. Game Cycle	A Game Cycle consists of all activities and communications during a game. When multiple games are accessible from the game lobby, Players may play on more 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. iii) After the Player has pressed the "play" button (or a similar entry point of the Game).	Compliant	
	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. 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).	Compliant	
	c) A Game Cycle is considered completed when the final transfer to the Player's credit units meter is complete or when all credits used for Wagering are lost.	Compliant	

Requirement No.	Requirement Assessed	Assessment Result	Comments
17.3 General Game Requirements			
17.3.1. Game information	The following requirements apply to the Game information, the Design, the paytables and the help screens, and include all written, graphics and audio information provided to the Player, either directly via the game interface or by a Website accessible to the Player, via a hyperlink 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 they shall not be misleading or unfair to the Player.	Compliant	
	b) All statements and graphics in the Game information, the Design, the paytables and the help screens shall be accurate and not misleading.	Compliant	
	c) All rules of the Game and paytable information shall be immediately available to the Player, at the Player interface, or accessible via a hyperlink at the Player interface, without requiring a deposit or Wagering.	Compliant	
	d) All rules of the Game and paytable information shall be sufficient to explain the entirety of the applicable rules and the manner in which the Player participates in every stage of the Game.	Compliant	
	e) Paytable information shall include every possible winning outcome, pattern, ranking and combination as well as their corresponding payouts, in a designated denomination/currency. All displayed payouts shall be theoretically feasible.	Compliant	
	f) Sufficient information shall be provided with regard to any prize payment setting, such as fees, commissions, graded commissions, etc., collected by the house.	Not Applicable	Not applicable to this game type.
	g) If the Design contains instructions for the Game, which determine a maximum profit, then it will only be possible to win this amount in only one Game (including features or other Game options).	Compliant	
	h) The Design shall contain the theoretical return to player (%RTP) and fully explain how it 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.	Compliant	

Requirement No.	Requirement Assessed	Assessment Result	Comments
	i) If the Design shows the actual %RTP, the number of games played and associated with this calculation shall be shown together with the period of time during which these games took place.	Compliant	
	j) If random/mystery prizes are offered, the maximum price that may be collected from them shall be stated. If this depends on the Wagers or any other factors, then this shall be mentioned.	Not Applicable	No random/mystery prizes are offered in this game.
	k) Multiple Wins. 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.	Compliant	

Requirement No.	Requirement Assessed	Assessment Result	Comments
	l) Extra lines. If Wagering on multiple lines is possible and it is not clear which reel positions are part of 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.	Not Applicable	No extra line in this game.
	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.	Not Applicable	No Scatter symbols in this game.
	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.

Requirement No.	Requirement Assessed	Assessment Result	Comments
	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. 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.	Not Applicable	Not applicable to this game type.
	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 Playing 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.).	Not Applicable	Not applicable to this game type.
	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	

Requirement No.	Requirement Assessed	Assessment Result	Comments
	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	
	j) The winning amount for each Wager and the total amount won shall be displayed on the screen.	Compliant	
17.3.3. Forced Game Play	a) The Player shall not be forced to play a Game by just selecting it.	Compliant	
	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	
	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	

Requirement No.	Requirement Assessed	Assessment Result	Comments
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	
	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	
	c) Any possible modification and/or combination of elements of the Game that produces outcomes of profit or loss is available for random selection at the start of each game, unless otherwise stated in the Game.	Compliant	
	d) The outcomes determined according to the resulting combinations based on the Game rules are applied immediately.	Compliant	
	e) If an a priori sequence or Mapping of symbols or outcomes (i.e. the location of hidden objects inside a labyrinth) is required, the symbols or outcomes may not be readjusted, unless this is provided for in the Game rules.	Not Applicable	No prior sequence or Mapping of symbols or outcomes in this game.
	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	

Requirement No.	Requirement Assessed	Assessment Result	Comments
17.3.8. Simulation of physical devices	When a Game depicts or implies that it involves a simulation of an actual device (e.g. spinning of wheels, rolling of dices, flipping of coins, dealing of cards, etc.), the simulation's behaviour follows the expected behaviour of the actual device, unless otherwise stated in the Game 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	No simulation of physical devices.
	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 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.	Not Applicable	No simulation of physical devices.
	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	No simulation of physical devices.
	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	No simulation of physical devices.
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.

Requirement No.	Requirement Assessed	Assessment Result	Comments
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 player. Bonus prizes, in general, are awarded as a result of a second (or subsequent) animation screen and, unless otherwise provided to the Player, they must be part of the theoretical %RTP of the full paytable. In Games that 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 during the Game.	Compliant	
	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.	Not Applicable	Not applicable to this game.
	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.	Not Applicable	No token collection in this game.
	g) If the bonus sequence consists of more than one feature games, the number of games remaining until the bonus sequence is displayed.	Not Applicable	This bonus does not consist of multiple sequential feature games.
	h) The Game must not adjust the likelihood of a bonus based on the history of prizes given 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).	Not Applicable	Bonus feature is not based on random previous events.
	i) If the bonus of a Game is triggered after collecting a certain number of events/symbols 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	Not Applicable	Bonus feature is triggered by collecting a number of events or symbols.

Requirement No.	Requirement Assessed	Assessment Result	Comments
	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 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.	Not Applicable	No held reels in this game.
	k) If a bonus feature is offered where the Player must wager extra credits, the Player is given the choice to play or not to play the bonus game. A Player that chooses not to play 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.	Not Applicable	Bonus features are not offered where extra credits are wagered.
17.4.2. Gamble Feature	The following requirements apply to Games that offer a gamble feature (these Games may also use terms such as Double-Up, Triple-Up or Take-or-Risk). The player is given a choice 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:	Not Applicable	No Gamble Feature.

Requirement No.	Requirement Assessed	Assessment Result	Comments
	a) The prize limit (if any) and the maximum number of available Wagers.	Not Applicable	No Gamble Feature.
	b) When the gamble feature is stopped before the maximum number of available Wagers is reached, the reason is clearly explained.	Not Applicable	No Gamble Feature.
	c) Any unusual game conditions of the Game, during which the gamble feature is not available, are explained.	Not Applicable	No Gamble Feature.
	d) If a gamble feature offers multiplier options, the range of options and payouts is explained to the Player.	Not Applicable	No Gamble Feature.
	e) The moment the Player chooses a multiplier, the selected multiplier is clearly displayed on the screen.	Not Applicable	No Gamble Feature.
17.5 Peer to Peer (P2P) Communication			
17.5. Peer to Peer (P2P) Communication Requirements	Bots are a type of artificial intelligence that may help a Player learn the environment and rules of the Game, and help them practice in the Game before participating in it.	Not Applicable	Information Only.
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.	Not Applicable	Not applicable to this game type.

Requirement No.	Requirement Assessed	Assessment Result	Comments
	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.	Not Applicable	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.
	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. Computerized Players	The following requirements apply for the use of computerized players used in free play or training mode.		
	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 / Tournaments	Organised events that allow the Player to either purchase or secure their participation in a competitive Game against other Players, the following rules apply:		
	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.	Not Applicable	Not applicable to this game type.

Requirement No.	Requirement Assessed	Assessment Result	Comments
	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.		
	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. 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.	Not Applicable	Not applicable to this game type

Requirement No.	Requirement Assessed	Assessment Result	Comments
17.6 Game Recall			
17.6.1. Player facing History	The option to "replay last game" shall be provided, either by reproduction or by description. The replay shall clearly state that this is a replay of the entire previous 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 Player either by graphics or by a text message.	Compliant	
	c) The total amount of money/credits of the Players at the beginning and/or at the end of the Game.	Compliant	
	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.
17.6.2. Back-end History	For each individual game play, in addition to the above mentioned required data, the CIS shall also record the following information: a) Unique Player ID. b) Any contributions in Progressive Jackpots lotteries. c) Game status (in progress, completed, etc.) d) The table number where the game was played (if any). e) The paytable that was used. f) The Game ID and its version.	Out of scope	Testing limited to functions controlled by the supplier.

Chapter 6. Requirements of Live Dealer Games			
Article 20. Requirements for live dealer games			
20.1 General requirements			
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 Displayed Information	Real-time information shall be provided to the Player, which include every available information of the Game and the equivalent to the respective online Game. This information includes:		
	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 Incomplete Games	In case a remote Player does not complete, for any reason, an action that is required for the Game to continue within the specified time:		
	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 Platform has undertaken to complete the game on behalf of the Player.	Not Applicable	Not applicable to this game type.
	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.

Requirement No.	Requirement Assessed	Assessment Result	Comments
	e) Any loss derived from the Game shall be withheld according to the Game rules.	Not Applicable	Not applicable to this game type.
	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 Internet 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.

Requirement No.	Requirement Assessed	Assessment Result	Comments
20.2.2 Game fairness	The following information must be readily available via the Game's internet interface or gateway during the entire Play Session as appropriate: NOTE: Nothing in this text excludes the possibility of applying promotions to Games where the Player is connected through an internet interface/gateway or traditional/land-based Games.		
	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. When a delay is obvious or created by the system, the size of the delay shall be notified to the Player.	Not Applicable	Not applicable to this game type.
	f) The rules, the Design and the functionality of the Game, which are made available to the 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.	Not Applicable	Not applicable to this game type.
	g) Players that participate in the Game (or wager on a future event) using the internet interface/gateway have the same chances to win or lose as the Players that use a traditional/land-based Game.	Not Applicable	Not applicable to this game type.

Article 21. Electronic Card Shuffler Requirements			
21.1 Random Number Generator			
21.1.1 General requirements	The Random Number Generator (RNG) and mechanical means ensure that the results of card games are random. The results: a) Are statistically independent. b) Comply with the desired random distribution. c) Successfully pass several recognised statistical tests. d) Are not predictable.	Not Applicable	RNG not utilised for Live Dealer Games purposes.
21.1.2 Applied Tests	The assessment laboratory uses several recognised tests to determine whether the random values generated by the random number generator pass or fail the desired confidence limit of 99%. These tests include, but are not limited to, the following: 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). l) 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	Not Applicable	RNG not utilised for Live Dealer Games purposes.

Requirement No.	Requirement Assessed	Assessment Result	Comments
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.

Requirement No.	Requirement Assessed	Assessment Result	Comments
21.10 Device functionality			
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. 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.	Not Applicable	RNG not utilised for Live Dealer Games purposes.

Chapter 9. Random Number Generator			
Article 25. Random 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: e217726HCKGRC
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) 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). l) Interactive Correlation Test. m) Serial correlation power test and serial correlation degree (the results must be independent of the previous Game).	Compliant	Please refer to RNG report: e217726HCKGRC

Requirement No.	Requirement Assessed	Assessment Result	Comments
	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 generator. Also, the scaling method shall safeguard the distribution of scaled values. For 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.	Compliant	Please refer to RNG report: e217726HCKGRC
25.4 Hardware-based Random Number Generator	Due to their nature, the performance of a hardware-based random number generator (RNG) may deteriorate over time. Failure of the hardware-based RNG might have serious 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 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.	Not Applicable	This is a software based RNG.

Requirement No.	Requirement Assessed	Assessment Result	Comments
25.5 Software-based Random Number Generator The following requirements 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: e217726HCKGRC
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: e217726HCKGRC
25.5.3 Background Cycling/Activity	In order to ensure that the RNG output cannot be predicted, proper background cycling/activity must be applied between the Games. When a Game output consists of multiple mapped RNG values, the background cycling/activity must be applied during the Game (i.e. between selection of each mapped RNG value) to ensure that the Game output does not consist of consecutive mapped RNG output. The background cycling/activity must be randomly activated, without intervention, in order to prevent any predictions.	Compliant	Please refer to RNG report: e217726HCKGRC
Chapter 10. Progressive Jackpot			
Article 26. Progressive 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.

Requirement No.	Requirement Assessed	Assessment Result	Comments
26.2 Progressive Jackpot Design and Function			
26.2.1 Progressive Jackpot fairness	The following principles must be applied to a Progressive Jackpot:		
	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.
	d) If a Player has to Wager a minimum amount in order to win a Progressive Jackpot, then the base game (without the Progressive Jackpot) must meet the requirement of minimum payout to the Player.	Not Applicable	No Progressive Jackpot in this game.
	e) The current amount of the Progressive Jackpot must be displayed on the devices of the 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.	Not Applicable	No Progressive Jackpot in this game.
	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 that may apply to each Progressive Jackpot.	Not Applicable	No Progressive Jackpot in this game.
	h) For progressive jackpots that offer multiple prize levels, if a particular combination that 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	Not Applicable	No Progressive Jackpot in this game.

Requirement No.	Requirement Assessed	Assessment Result	Comments
	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 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.	Not Applicable	No Progressive Jackpot in this game.
26.2.2 Slave Progressive Jackpot controllers	When a "Master Controller" uses "Slave Controllers" to control a Progressive Jackpot, the following requirements apply:	Not Applicable	No Progressive Jackpot in this game.
	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.
	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.

Requirement No.	Requirement Assessed	Assessment Result	Comments
26.2.3 Progressive Jackpot Win Notifications	In the event of a jackpot win, the following requirements must be met:		
	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 the Progressive Jackpot Parameter	For the configuration of progressive jackpots, the following requirements apply:		
	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.
	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.
	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.

Requirement No.	Requirement Assessed	Assessment Result	Comments
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 Jackpot Shutdown	If a Progressive Jackpot must be closed (e.g. malfunction, loss of connectivity, unexpected shutdown), the following requirements shall apply:		
	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.

Requirement No.	Requirement Assessed	Assessment Result	Comments
26.2.7 Progressive Jackpot Recovery	To activate the recovery of the current value of Progressive Jackpot amounts, in the event of malfunction of a CIS subsystem or the Progressive Jackpot controller, 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.
	In any case, all Progressive Jackpot winners that were selected must be paid as soon as the 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.	Not Applicable	No Progressive Jackpot in this game.

4.2. Gaming Regulation

Requirement No.	Requirement Assessed	Assessment Result	Comments
Article 12. Other Online Games			
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 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 variations of it, the result of which is extracted from a Random Number Generator. The maximum amount of Participation in other online games when conducted using a Random Number Generator is two (2) euros. c. Poker and/or peer to peer variations, either poker cash games or in the form of poker tournaments.	Compliant	
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 winnings in the Games of case (b), paragraph 12.1 shall not exceed seventy thousand (70,000) euros per Game Cycle, including the value of all the additional rewards of the Game which are permitted to be provided, excluding any award of Jackpot, 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.

Requirement No.	Requirement Assessed	Assessment Result	Comments
Article 13. Jackpot Function			
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.
13.7	13.7. In any case of reduction of the amount accumulated based on the 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.	Not Applicable	No Progressive Jackpot in this game.
Article 16. Participation in The Games			
16.1	16.1. Participation in the Games is the result of free and independent personal 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.	Compliant	Information on addiction on the License Holder's Website is not managed by the supplier.
16.2	16.2. License Holder provides information to the Player about: 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.	Compliant	Information on addiction on the License Holder's Website is not managed by the supplier.

Requirement No.	Requirement Assessed	Assessment Result	Comments
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 three (3) seconds have elapsed 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.	Compliant	
Article 17. Game Guide			
17.1	17.1. On its Website, the License Holder shall post a Game Guide, in Greek, which shall include, per Game or Group of Games, at least the description of the Game 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.	Compliant	Publication of these rules on the License Holder website is not managed by the supplier.

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

Requirement No.	Requirement Assessed	Assessment Result	Comments
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 maintains 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 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 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 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. Electronic Account.	Not Applicable	No Progressive Jackpot in this game.

Requirement No.	Requirement Assessed	Assessment Result	Comments
6.5.5 Jackpot function	3. The information on the amount of the Progressive Jackpot Mode, as formulated 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	Not Applicable	No Progressive Jackpot in this game.
6.5.5 Jackpot function	4. In cases where a Progressive Jackpot Mode is to be terminated (e.g 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.	Not Applicable	No Progressive Jackpot in this game.
6.5.5 Jackpot function	7. Through the Game Guide the Player is informed about the Jackpot Functions and 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.	Not Applicable	No Progressive Jackpot in this game.