



# TEST REPORT

Report  
NMI/089/075/UK/RTS/02  
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Report to: **Evolution Gaming**

Project name: **Live Dealer Games on the Evolution Gaming platform**

Jurisdiction: **United Kingdom**

Issue date: **06 October 2016**

## Executive summary

This report summarises the testing of titles from Evolution Gaming's suite of Live Dealer games.

The games have been assessed for compliance against all applicable sections of the United Kingdom Gambling Commission's (UKGC) "Remote gambling and software technical standards" (July 2015), to the scope of testing requested.

Our assessment methods included verification of player returns by analysis of the game rules, visual assessment and manual play of the games as deployed on the testing site, analysis of the evidence provided and a site visit to the companies live dealer studios and offices in Riga, Latvia.

Testing for all sections except 13B was performed on the following baseline:

- Platform supplier: Evolution Gaming
- Platform version: Evolutiongaming 5.85
- Game versions: 5.86
- Versions of the game that these versions supersede: 5.85

Section 13B was certified in a separate environment, at a later date, using the URL specified in the appendices.

Due to the nature of Evolution Gaming's live gaming products and services this evaluation is based on functional testing, observations of the gaming environment, review of processes and procedures, and inspection of internal monitoring systems. Analyses of the critical software components have been undertaken. NMI has not tested the physical casino equipment responsible for result determination, nor the peripherals responsible for the transcription of outcomes from the physical realm to the digital. Nor has statistical testing under laboratory conditions or verification of Evolution Gaming's data and tools been conducted. A review of purchasing and maintenance policies and procedures was conducted and the details are summarised in the "Casino Equipment" section. Evolution Gaming supplied evidence of their calibration, levelling, cleaning and maintenance of hardware, and ongoing RTP monitoring methodology. These were "game only" tests and only the English language and EUR currency versions of the games were tested.

No issues are raised.

*This report supersedes report NMI/089/075/UK/RTS/01*

Authorised by:

Tom Cartledge  
Senior Project Manager

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## Introduction

NMi Metrology & Gaming Ltd ("NMi UK") is accredited to ISO/IEC 17025:2005 (by the United Kingdom Accreditation Service, UKAS) to undertake compliance testing of all categories of modern gaming systems and related equipment at their own and their customer's premises. NMi UK's ISO 17025 accreditation schedule is downloadable from the UKAS website.

### Scope of ISO/IEC 17025:2005

All assessments in the following sections of this report are provided under ISO/IEC 17025:2005 except (as in the case of interpretations, opinions and suggestions) where otherwise stated.

### Quality Control

The monitoring of this testing project was the responsibility of NMi's Quality Manager and every effort has been made to ensure the accuracy of the information contained in this report. If errors or omissions are discovered, please contact us with details as soon as possible. NMi reserves the right to revise and reissue this Test Report if additional information is presented or discovered.

### Caveats

The results presented in this document are a summary of the testing work undertaken, and this report is subject to a number of caveats, including:

- All items provided for inspection and/or testing are declared by the customer to be configured identically to those in commercial use, with the exception of operator-configurable aspects that will not have a bearing on game fairness or player returns.
- All software and source code provided for empirical testing and/or code review is declared by the customer to behave identically to the software and code in commercial use.
- Decisions taken by the supplied software in automatic test modes / simulators are reasonable emulations of those that would be expected to be taken by real players.

All efforts have been taken to ensure that the testing undertaken has been as exhaustive as necessary to demonstrate compliance or non-compliance. NMi UK takes on trust that all test items (including all hardware and software), all documentation and all communications are accurate, truthful, and that there is no intention to deceive or subvert the assessment of compliance.

## Games Tested

| Game Name                      | Device           | RTP  |
|--------------------------------|------------------|--|
| Baccarat                       | Desktop / Mobile | 98.94% for the Ante bet, 89.64% for the Banker Pair, 89.64% for the Player Pair, 91.95% for the Perfect Pair, 86.29% for the Either Pair, 97.35% for the Player Bonus and 90.63% for the Banker Bonus. |
| Blackjack                      | Desktop / Mobile | 99.28% for the Ante bet and Bet Behind feature, 95.90% for the Perfect Pairs bet, and 96.30% for the 21+3 Bonus bet.   |
| Caribbean Stud Poker           | Desktop / Mobile | 96.30% and a "Return to player (on total wager)" i.e. Element of Risk of 98.19% and 91.44% for the 5+1 bonus bet.  |
| Casino Hold'em                 | Desktop / Mobile | 97.84% for the Ante bet and 93.74% for the Bonus Bet.  |
| Double Ball Roulette           | Desktop / Mobile | From 94.67% to 97.30% depending on the bet placed.   |
| French Roulette                | Desktop / Mobile | 98.65%   |
| Roulette                       | Desktop / Mobile | 97.30%   |
| Slingshot Auto French Roulette | Desktop / Mobile | 98.65%   |
| Slingshot Auto Roulette        | Desktop / Mobile | 97.30%   |
| Three Card Poker               | Desktop / Mobile | 96.63% for the Ante bet, 95.51% for the Pair Plus Bet, and 91.44% for the 6 Card Bonus bet.  |
| Ultimate Texas Hold'em         | Desktop / Mobile | 99.47% for the main bet, 97.82% for the Ante Bet & an RTP of 96.50% for the Trips Bet.   |

### Baccarat

*Baccarat* is an online "live dealer" Baccarat game. The player and banker receive two or three cards with the aim of getting as close as possible to 9. The player must bet on the outcome (Player, Banker or Tie). The game is played with 8 decks.

The alternative mode of dealing hands known as "Baccarat Squeeze" was also observed during testing. It does not, however, affect the outcome of the game.

### Blackjack

*Blackjack* is an online "live dealer" Blackjack card game with standard rules and pay-outs. The dealer stands on 17. The player can play up to 3 hands of cards. Insurance, Splits and Doubles are offered. The game is played with 8 decks. Optional perfect pairs, 21+3 and bet behind side bets are available.

The calculator used to determine player returns for Blackjack can be found in the "Wizard Of Odds" website (<http://wizardofodds.com/games/blackjack/calculator/>). The website and returns calculators are recognised as a trusted resource and are widely referenced by the industry. The Blackjack calculator has been validated against results of our own simulations for sample rule sets.

### Caribbean Stud Poker

*Caribbean Stud Poker* is an online "live dealer" poker game offering a choice of stakes. The game is played with a standard 52 card deck (excluding Jokers) which is shuffled after each game round. The game features 5 cards dealt face down and revealed when the player commits their stake. The player can then exchange any cards in a second draw. Prizes are then calculated and awarded. The player can decide to play multiple hands simultaneously. The game also contains an optional 5+1 bonus side bet feature. The game also contains an optional 5+1 bonus side bet feature.

### Casino Hold'em

*Casino Hold'em* is an online "live dealer" poker game based on standard Texas Hold'em rules, with an optional feature. The game uses a single deck of cards which is shuffled after every round of play and is played against the house (rather than other players). An optional bonus bet is available once the Ante bet has been committed.

## **Double Ball Roulette**

*Double Ball Roulette* is an online "live dealer" Roulette game that features two balls and offers a choice of stakes. The game displays a Roulette wheel with pockets numbered 0 to 36 and offers the usual multiple bet options: red/black, dozens, odds/evens, etc. Bets are placed in increments depending on the chip value selected by the player.

## **French Roulette**

*French Roulette* is an online "live dealer" Roulette game. The game wheel has 37 pockets and offers the standard bet types across the table. The goal of the game is to anticipate where the ball will land on the wheel and place bets accordingly.

## **Roulette**

*Roulette* is an online "live dealer" Roulette game. The game wheel has 37 pockets and offers the standard bet types across the table. The goal of the game is to anticipate where the ball will land on the wheel and place bets accordingly.

## **Slingshot Auto Roulette**

*Slingshot Auto Roulette* is an online Roulette game. The game wheel has 37 pockets and offers the standard bet types across the table. The goal of the game is to anticipate where the ball will land on the wheel and place bets accordingly.

## **Slingshot Auto French Roulette**

*Slingshot Auto French Roulette* is an online "live dealer" Roulette game. The game wheel has 37 pockets and offers the standard bet types across the table. The goal of the game is to anticipate where the ball will land on the wheel and place bets accordingly.

## **Three Card Poker**

*Three Card Poker* is an online "live dealer" poker game offering a choice of stakes. The game is played with a standard 52 card deck (excluding Jokers) which is shuffled after each game round. The player is required to place an Ante bet and has the option of also placing a "Pair Plus" feature and/or a "6 Card Bonus" bet. The player is dealt 3 cards and the dealer's 3 cards are dealt face down. The player is then given the choice to play the hand or fold; if they choose to play, a bet equivalent to the Ante is committed to the table. If the player has a hand which beats the dealer's, a prize is awarded. Optional pair plus and 6 card bonus side bets are available.

## **Ultimate Texas Hold'em**

*Ultimate Texas Hold'em* is an online "live dealer" poker game offering a choice of stakes. The game is played with a standard 52 card deck (excluding Jokers) which is shuffled after each game round. The player is required to place an Ante bet and has the option of also placing an additional side bet. The player is dealt 2 cards and the dealer's 2 cards are dealt face down. The player is then given the choice to place an ante bet (x3 or x4) or to check; if they choose to place an ante bet, all five community cards are dealt and the player's best five-card poker hand is evaluated against the dealer's best five-card poker hand. If the player checks, three community cards are dealt and the player has to decide again whether to check or place an ante bet (x2); if they choose to place an ante bet, the remaining two community cards are then dealt and the player's hand is evaluated against the dealer's hand. If the player checks, the remaining two community cards are dealt and the player has a final choice. At this point the player can decide to Fold (surrender the Ante and Blind bets) or place an ante bet (x1). The player's hand is evaluated against the dealer's hand and against the "Trips" payouts and any prizes are awarded.

## Testing Overview

### Customer Contacts

The customer liaison was Patrisia Himenes.

### Dates

Testing was undertaken during the following periods:

- 20/11/2015 - 02/12/2015 (Caribbean Stud Poker Including Side Bets)
- 01/03/2016 - 08/03/2016 (Updated Roulette UI)
- 15/03/2016 - 23/03/2016 (Updated Casino Hold'em and Three Card Poker UI)
- 22/03/2016 - 30/03/2016 (Updated Blackjack UI)
- 07/04/2016 - 11/04/2016 (Section 13B reality checks)
- 26/04/2016 - 06/05/2016 (Double Ball Roulette)
- 23/05/2016 - 27/05/2016 (Slingshot Auto French Roulette UI and Slingshot Auto Roulette UI)
- 02/06/2016 - 13/06/2016 (Updated Blackjack UI)
- 02/08/2016 - 15/08/2016 (Ultimate Texas Hold'em)

### Locations

Testing was undertaken at the following locations:

- Llys Helyg, Parc Menai, Bangor LL57 4EZ, UK.
- 530-4445 Lougheed Highway, Burnaby, British Columbia, V5C 0E4, Canada.

### Applicable Standards

Conformance with the following standards has been assessed, under the terms of NMI UK's ISO/IEC 17025:2005 accreditation:

| Document   | Abbreviation Used |
|--|-------------------|
| Remote Gambling and Software Technical Standards (July 2015) | UK_RTS            |

### Methods

Our assessment methods included verification of player returns by analysis of the game rules, visual assessment and manual play of the games as deployed on the testing site, analysis of the evidence provided and a site visit to the companies live dealer studios and offices in Riga, Latvia.

## Code Analysis

The submissions consisted of Java and Scala source code files and included outcome logic and platform code.

### Game Outcome

The game outcomes are determined in accordance with the game rules. No code was observed which would introduce adaptive or deterministic behaviours.

## Casino Equipment

### Roulette Wheels

All Roulette wheels are sourced from a reputable company who are one of the world's largest manufacturers of such devices. Each Roulette wheel is provided with a unique identifier for scheduling maintenance and tracking its usage and movements around the studio.

### Cleaning & Maintenance

The Roulette wheels in current usage are levelled and balanced prior to fitting and are cleaned twice a day by a dedicated team. Evidence has been provided showing the cleaning schedule, as well as each wheel's maintenance history and use in ongoing operations.

### Balancing and Levelling

Evidence of a suitably rigorous calibration schedule has been provided, along with details of any discrepancies in calibration, and game outcomes before and after levelling.

### Transfer of Results

Each Roulette wheel has a built-in API which reads the time of the start of the spin, the rotation speed of the wheel, the rotational direction of the wheel, and the number of the pocket in which the ball lands, and this information is sent to the dealer module. This API has been provided by the manufacturer of the wheel, is built into the firmware, and no modifications are ever made to the provided API.

### Automatic Shuffling Machines

Shuffling machines are used for shuffling the decks of cards. As with the Roulette wheels, each shuffling machine is issued with its own unique identifier for tracking purposes and for maintenance scheduling. Evidence has been provided which shows that each machine is cleaned and maintained every day.

The shuffle machines are sourced from a reputable manufacturer and we are advised that they were extensively tested before commitment to purchase was made. The manufacturer supplies warranty and maintenance packs, and regularly visits to provide servicing for each machine.

### Transfer of Results

Each card features a barcode. As the dealer deals a card it is swiped over a barcode reader which sends this information to the dealer module. There is no manual intervention in the capture of card information.

### Ongoing RTP Monitoring

The RTP of each game and table is closely monitored by the Risk Assessment team. Data is mined from the outcome of the games played on each table/wheel and captured to a database for downstream analysis. The database is used to verify the actual RTP achieved on a per table/wheel basis for a specified period of time, and these are assessed against theoretical expectation.

## Test Environment

The games were functionally tested in at least one of the following player environments:

### Desktop PCs

| Item             | Description        | Version  |
|------------------|--------------------|----------|
| Hardware         | Dell Optiplex 7010 |          |
| Operating System | Windows            | 6.1.7601 |
| Browser          | Google Chrome      | Various  |
| Plug-in          | Adobe Flash Player | Various  |

### Android

| Item             | Description          | Version        |
|------------------|----------------------|----------------|
| Hardware         | Samsung Galaxy Tab 3 |                |
| Screen size      | 10.1 inch            |                |
| Orientation      | Landscape            |                |
| Operating System | Android              | 4.2.2 or later |
| Browser          | Google Chrome        | Various        |

| Item             | Description       | Version      |
|------------------|-------------------|--------------|
| Hardware         | Samsung Galaxy S3 |              |
| Screen size      | 4.8 inch          |              |
| Orientation      | Landscape         |              |
| Operating System | Android           | 4.3 or later |
| Browser          | Chrome            | Various      |

| Item             | Description    | Version        |
|------------------|----------------|----------------|
| Hardware         | Samsung Note 3 | SM-N9005       |
| Screen size      | 5.7 inch       |                |
| Orientation      | Landscape      |                |
| Operating System | Android        | 4.4.2 or later |
| Browser          | Google Chrome  | Various        |

### Apple iOS

| Item             | Description   | Version      |
|------------------|---------------|--------------|
| Developer Tool   | Xcode         | Various      |
| Emulator         | iOS Simulator | Various      |
| Operating System | iOS           | 8.1 or later |

| Item             | Description | Version        |
|------------------|-------------|----------------|
| Hardware         | iPhone 4    |                |
| Screen size      | 3.5 inch    |                |
| Orientation      | Landscape   |                |
| Operating System | iOS         | 7.0.3 or later |
| Browser          | Safari      |                |

| Item             | Description | Version      |
|------------------|-------------|--------------|
| Hardware         | iPhone 5s   |              |
| Screen size      | 4 inches    |              |
| Orientation      | Landscape   |              |
| Operating System | iOS         | 8.1 or later |
| Browser          | Safari      |              |

| Item             | Description | Version      |
|------------------|-------------|--------------|
| Hardware         | iPhone 5    |              |
| Screen size      | 4 inches    |              |
| Orientation      | Landscape   |              |
| Operating System | iOS         | 8.1 or later |
| Browser          | Safari      |              |

| Item             | Description | Version      |
|------------------|-------------|--------------|
| Hardware         | iPhone 6    |              |
| Screen size      | 4 inches    |              |
| Orientation      | Landscape   |              |
| Operating System | iOS         | 8.1 or later |
| Browser          | Safari      |              |

| Item             | Description | Version      |
|------------------|-------------|--------------|
| Hardware         | iPad Retina |              |
| Screen size      | 4 inches    |              |
| Orientation      | Landscape   |              |
| Operating System | iOS         | 8.1 or later |
| Browser          | Safari      |              |

## Test Item Details

### Critical Components

The files below have been identified as the critical components integral to the outcome of the respective games. The SHA-1 checksum has been calculated for each file. All checksums are from version 5.86.

#### Baccarat

|  |                             |
|--|-----------------------------|
| 8d1db81554f93a0b2eb9020f235baadd6daf7144 | baccarat/Hand.class         |
| 60d2939a120b44343632f1385797daab6651e328 | BaccaratGame.class          |
| bec9e84a75baa73a69c495ac6586a40240f19d0  | BaccaratModel.class         |
| 66d13c9966694165d87184c1228cb2e51707d69a | BaccaratPayouts.class       |
| 1dff38a63b61756c150ff3d8f2d9c887661d123f | PlayerBetting.class         |
| 3c0c6f8b79410ad69721fb7303e9f4d2716fc1cb | BaccaratHelper.class        |
| 38739a15a70c6f3ae08810066b685b98a44a019a | BaccaratResultFactory.class |
| 479dad634a978b378cfd7b50e0fbecb2efe34635 | BaccaratService.class       |
| 4b0fbd162492ba3e3e318a3d4f15ac184b7d449c | BaccaratProEngine.class     |

#### Blackjack

|  |   |
|--|---|
| 22dca90d2b01d30fbae04ff9662fa261c550860b | blackjack/Hand.class                          |
| e32708e83d950598c41f5b29f80addc00fada657 | blackjack/HandPosition.class                  |
| 321986388c34e81684252907b32d162c0a2a7454 | blackjack/_21plus3CalculationService.class    |
| 4e4459113c33a64da091a9141c3012e4985590da | BlackjackGameController.class                 |
| 9e7975c5be466fef83756144924e66376ebe9eac | BlackjackHelper.class                         |
| 5277663a7c55dfab9a5be454a9f6413d5e285c5d | BlackjackResult.class                         |
| 764215bbf2294a79d27e73411b2099dba77b1faf | BlackjackResultController.class               |
| eea25c7948aaa466c4e4c029e1d881de60b9fc16 | blackjack/PerfectPairCalculationService.class |
| 7382f796a7da20dfec2f542a9af2ec54dc6939db | blackjack/SideBetCalculationService.class     |

#### Poker

##### Caribbean Stud Poker

|  |  |
|--|--|
| 2b2f6c4e28c5714ec5f9cf53266ee72df8e6cded | poker/service/BettingService.class         |
| 648009e54bc4e1e1213f3efa0296da4780a13bc1 | poker/evaluation/HashLookup.class          |
| 2bc7be02fed66a3b72d75a2fd2f804797c2cacbc | poker/evaluation/FlushLookup.class         |
| bd0268b7314d142e3d126d1f1a3ed491135e0b5b | EvaluationServiceImpl.class                |
| 17dd6fdea768501585637e02c5375b299480b1c4 | poker/engine/holdem/HoldemGameEngine.class |
| ed819012c8c84ddf47b4a8fb0d80bbe06ce02a0  | poker/service/PokerGamesHelper.class       |
| 4c5fc9654d557da250bb3769788d752cf0290e83 | poker/evaluation/Unique5Lookup.class       |

##### Casino Hold'em

|  |                                    |
|--|------------------------------------|
| 2b2f6c4e28c5714ec5f9cf53266ee72df8e6cded | poker/service/BettingService.class |
| bd0268b7314d142e3d126d1f1a3ed491135e0b5b | EvaluationServiceImpl.class        |
| 648009e54bc4e1e1213f3efa0296da4780a13bc1 | poker/evaluation/HashLookup.class  |
| 2bc7be02fed66a3b72d75a2fd2f804797c2cacbc | poker/evaluation/FlushLookup.class |
| 87fb9f97ecee2ca4852d812cce9e1af2f2d0a5b0 | HoldemPayTables.class              |

|  |                                      |
|--|--------------------------------------|
| ed819012c8c84ddf47b4a8fb0d80bbfe06ce02a0 | poker/service/PokerGamesHelper.class |
| 4c5fc9654d557da250bb3769788d752cf0290e83 | poker/evaluation/Unique5Lookup.class |

### Three Card Poker

|  |                                      |
|--|--------------------------------------|
| 1209b133e86720eb474306f2e81b7af5a227570b | TCPGameEngine.class                  |
| 2848e627f3451ff1e5352b9e71a4fdbd72836094 | TCPPayoffEvaluation.class            |
| 03c66f56b65ef190c3d72962f9ee669866590a41 | TCPPayTables.class                   |
| 2b2f6c4e28c5714ec5f9cf53266ee72df8e6cded | poker/service/BettingService.class   |
| bd0268b7314d142e3d126d1f1a3ed491135e0b5b | EvaluationServiceImpl.class          |
| 648009e54bc4e1e1213f3efa0296da4780a13bc1 | poker/evaluation/HashLookup.class    |
| 2bc7be02fed66a3b72d75a2fd2f804797c2cacbc | poker/evaluation/FlushLookup.class   |
| 4c5fc9654d557da250bb3769788d752cf0290e83 | poker/evaluation/Unique5Lookup.class |
| ed819012c8c84ddf47b4a8fb0d80bbfe06ce02a0 | poker/service/PokerGamesHelper.class |

### Ultimate Texas Hold'em

|  |                                     |
|--|-------------------------------------|
| 3572de53ecf92936b9dc6b13af9541216954b351 | uth/UthEvaluation.class             |
| b942e1c01c6c68d1378dfe6d270b1ac5e5d71bf3 | uth/UthGame.class                   |
| f061fa18e579668ab67bfa4937a9adccd865f00c | uth/UthPayTables.class              |
| f0c087639636ca1c72f1ebdf6e5f155502728fcd | uth/UthTable.class                  |
| 3f28d23590e27fc5dff672a43220c87ad36901e  | uth/listener/BettingProcessor.class |

### Roulette

#### Double Ball Roulette, French Roulette, Roulette, Slingshot Auto Roulette & Slingshot Auto French Roulette

|  |                                 |
|--|---------------------------------|
| cca4651d892d9e1ca6ad391aae729eb18fe17901 | roulette/BetCode.class          |
| 1f466a7cb9ed42700613b745ea8d8a8e7f0ed709 | roulette/BetResult.class        |
| 08e95be94347c38ef625f88ba59248c636783971 | roulette/DbrBetCode.class       |
| dabbbf96ca2f3286eba346178e75eda5bb932e83 | Payouts.class                   |
| 9c89597fe6a8b4077b4c14b41566e67f141930b4 | RouletteGame.class              |
| 04b66bbe66dfba829688c7206de8af21a3d62de7 | RouletteTable.class             |
| 6c2c06aa57c2be959351f3c4983bbfe14b16b092 | roulette.properties             |
| cd2779291f3382586382e6a62abe13cb245adccc | french_roulette.properties      |
| dee6208d2227f6ff2604777d0eba2d96fbaedc7  | SbrBetCode.class                |
| 647a999440286594bda66bd9e508b08c0f07b344 | RouletteHelper.class            |
| 6edea9f5f054970cdd4bf5513bff6ab945ef3696 | RouletteBettingService.class    |
| 801ab1a31f608fcd8318e5e36fa3e98e150e31c  | RouletteController.class        |
| ae8225e3ccf437e6cda58c7365a96dc9963c14e7 | RouletteEngine.class            |
| 52c421de62e12a7ed58143c7796e8915096d6abd | RouletteResult.class            |
| 81dbdc6ff7949a6259989c4c3f7d3e4a28265408 | RouletteSettlementService.class |
| 954bedff0bdcc1edfe8bd8a78bc01366b2416d9e | RoulettePlaceBetHandler.class   |

## Appendix A: Requirements Met

|                     |  |
|---------------------|--|
| <b>Reference:</b>   | UK_RTS / RTS - 2 Displaying transactions (3.2:1, 3.2A, 3.2A.a)   |
| <b>Requirement:</b> | <p>To enable the customer to understand the value and content of their transactions.</p> <p>The remote gambling system must be designed to make available clear information about the amount of money being gambled by the customer, including any conversions from one form of currency to another, or from currency to credits, chips or other tokens etc, at the point of conversion. For telephone gambling, this information is to be delivered by the customer service agent or automated response system.</p> <p>a. It is preferable for the amount being gambled to be displayed either in the currency of the customer's account or in the currency of the product. The use of credits, chips or other tokens with no face value should be avoided wherever possible.</p> |
| <b>Assessment:</b>  | On each game tested the amount being gambled is clearly shown and in the currency of the gambling system.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 2 Displaying transactions (3.2:1, 3.2A.b)  |
| <b>Requirement:</b> | <p>To enable the customer to understand the value and content of their transactions.</p> <p>b. Any conversion from one currency to another should be clearly presented to the customer and any conversion rules are also to be presented. Where currency is converted into tokens, chips or credits, etc, the conversion should be clearly displayed.</p> |
| <b>Assessment:</b>  | The value of each chip is presented as a monetary value.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 2 Displaying transactions (3.2A.c, 3.2A.c.i)  |
| <b>Requirement:</b> | <p>c. Information about the value of the gamble should be displayed including, as appropriate:</p> <p>i. unit stake and total stake, whether currency, credit, tokens, chips, or any other form of payment</p> |
| <b>Assessment:</b>  | The amount being gambled is clearly shown and in the currency of the gambling system.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 2 Displaying transactions (3.2A.c, 3.2B)  |
| <b>Requirement:</b> | <p>c. Information about the value of the gamble should be displayed including, as appropriate:</p> <p>The gambling system must be designed to display sufficient relevant information about the customer's gamble so that the content of the gamble is clear. This information must be made available before the customer commits to the gamble including, for example, in the artwork and textual information displayed during gaming, or on an electronic equivalent of a betting slip or lottery ticket. For telephone betting, this information is to be delivered by the customer service agent or automated response system.</p> |
| <b>Assessment:</b>  | All relevant information about the games, stakes and pay tables can be found in both the main display and the help screen which are available for each game.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 2 Displaying transactions (3.2B.a, 3.2B.a.i, 3.2B.a.ii, 3.2B.a.iii)  |
| <b>Requirement:</b> | <p>a. The following items provide guidelines about the type of information that may be relevant:</p> <p>i. selections – the items the customer has chosen to gamble on;</p> <p>ii. the bet type</p> <p>iii. the accepted odds, for example current odds, starting price, first show, etc.</p> |
| <b>Assessment:</b>  | All relevant information about the games, stakes and pay tables can be found in both the main display and the help screen which are available for each game.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3:1, 3.3A, 3.3A.a, 3.3A.b, 3.3A.c)   |
| <b>Requirement:</b> | <p>To enable customers to make informed decisions about whether to gamble based on their chances of winning, the way the game, lottery or event works, the prizes or payouts on offer and the current state of multi-state games or events.</p> <p>An explanation of the applicable rules must be easily available to the customer before they commit to gamble. The content including artwork and text must be accurate, and sufficient to explain all of the applicable rules and how to participate. All reasonable steps must be taken to ensure that the content is understandable.</p> <p>a. Explanatory content includes information in artwork and text displayed within the virtual event, in 'help' or 'how to play' pages, or other supporting material.</p> <p>b. Links to the information should be prominently placed, for example on home pages for gaming sections, game selection pages or menus, or within individual games, so that customers can easily locate them.</p> <p>c. As a minimum, restricted display devices should provide explanatory content via a menu item or other link.</p> |
| <b>Assessment:</b>  | For each game tested, all game rules, 'how to play', payouts and RTPs are available to the customer without any commitment to gamble. These are accessible directly from the main game page via a 'Help' button.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3A.d, 3.3A.d.i)  |
| <b>Requirement:</b> | <p>d. The following items provide guidelines on the type of explanatory content that may be relevant and should be considered for inclusion:</p> <p>i. the name of the game, lottery or virtual event</p> |
| <b>Assessment:</b>  | For each game tested, the name of the game is shown on entry and on the main game page.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3A.d, 3.3A.d.ii, 3.3A.d.iii)   |
| <b>Requirement:</b> | <p>d. The following items provide guidelines on the type of explanatory content that may be relevant and should be considered for inclusion:</p> <p>ii. the applicable rules, including clear descriptions of what constitutes a winning outcome</p> <p>iii. restrictions on play or betting, such as any play duration limits, maximum wins, etc</p> |
| <b>Assessment:</b>  | For each game tested, all game rules, 'how to play', payouts and RTPs are available to the customer without any commitment to gamble. These are accessible directly from the main game page via a 'Help' button.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3A.d, 3.3A.d.iv)  |
| <b>Requirement:</b> | <p>d. The following items provide guidelines on the type of explanatory content that may be relevant and should be considered for inclusion:</p> <p>iv. the number of decks or frequency of shuffles in virtual card games</p> |
| <b>Assessment:</b>  | In all card games tested the number of decks used is shown within the help screens.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3A.d, 3.3A.d.vi)  |
| <b>Requirement:</b> | <p>d. The following items provide guidelines on the type of explanatory content that may be relevant and should be considered for inclusion:</p> <p>vi. instructions on how to interact with the game</p>        |
| <b>Assessment:</b>  | For each game tested, all game rules, 'how to play', payouts and RTPs are available to the customer without any commitment to gamble. These are accessible directly from the main game page via a 'Help' button. |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3A.d, 3.3B) |
| <b>Requirement:</b>   |  |
| d. The following items provide guidelines on the type of explanatory content that may be relevant and should be considered for inclusion:<br>Where relevant, as the game or event progresses, information that may reasonably be expected to enable the customer to understand the current state must be displayed. |  |
| <b>Assessment:</b>  |  |
| For each game tested, all game rules, 'how to play', payouts and RTPs are available to the customer without any commitment to gamble. These are accessible directly from the main game page via a 'Help' button.  |  |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3C:1, 3.3C:1.i, 3.3C:1.ii, 3.3C:1.iii, 3.3C:1.iv) |
| <b>Requirement:</b>   |  |
| For each virtual event, game (including bingo), or lottery, information that may reasonably be expected to enable the customer to make an informed decision about his or her chances of winning must be easily available before the customer commits to gamble. Information must include:<br>i. a description of the way the game works and the way in which winners are determined and prizes allocated;<br>ii. house edge (or margin);<br>iii. the return to player (RTP) percentage; or<br>iv. the probability (likelihood) of winning events occurring. |  |
| <b>Assessment:</b>  |  |
| For each game tested, all game rules, 'how to play', payouts and RTPs are available to the customer without any commitment to gamble. These are accessible directly from the main game page via a 'Help' button.  |  |

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| <b>Reference:</b>  | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3C.a, 3.3C.a.iii) |
| <b>Requirement:</b>  |  |
| a. The following items provide further guidance on acceptable types of information about the likelihood of winning:<br>iii. the average theoretical return to player percentage. Where an event (other than peer-to-peer) involves an element of skill, return to player percentage should be calculated using either the auto-play strategy or a standard/published strategy; |  |
| <b>Assessment:</b>   |  |
| The percentage RTPs of all games which offer an element of skill are calculated for optimum player strategy. These are standard table games (and standard side bets) and the optimal strategy can be readily determined by the player or obtained from published reference sources.  |  |

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| <b>Reference:</b>  | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3C.a, 3.3C.a.iv, 3.3C.a.v, 3.3C.b, 3.3C.c, 3.3D, 3.3D.a) |
| <b>Requirement:</b>  |   |
| a. The following items provide further guidance on acceptable types of information about the likelihood of winning:<br>iv. the house edge, margin or over-round, for example for a virtual race;<br>v. the probability of each winning event occurring, or such information as may reasonably be expected to allow the customer to calculate the probability that the event will occur. The nature of some games may mean that the game itself provides sufficient information, for example, the likelihood of rolling a six on a six-sided die would not require further explanation.<br>b. Information may be included in artwork and text displayed within the virtual game or event, in 'help' or 'how to play' pages, or other supporting material.<br>c. Information should be easily accessible, for example by placing links on home pages for gaming or virtual event sections, game selection pages or menus, or within individual games.<br>For each virtual event, game (including bingo), or lottery, content describing the potential prizes and payouts or the means by which these are calculated or determined must be easily available before the customer commits to gamble.<br>a. Information should be made available about the amounts that customers may potentially win, for example in the form of pay-tables, or by showing the odds paid for particular outcomes. |   |
| <b>Assessment:</b>   |   |
| For each game tested, all game rules, 'how to play', payouts and RTPs are available to the customer without any commitment to gamble. These are accessible directly from the main game page via a 'Help' button.   |   |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3C.a, 3.3D.d, 3.3D.e)   |
| <b>Requirement:</b> | <p>a. The following items provide further guidance on acceptable types of information about the likelihood of winning:</p> <p>d. Information may be included in artwork and text displayed within the virtual event, in 'help' or 'how to play' pages, or other supporting material.</p> <p>e. Information should be easily accessible, for example by placing links on home pages for gaming sections, game selection pages or menus, or within individual games.</p> |
| <b>Assessment:</b>  | For each game tested, all game rules, 'how to play', payouts and RTPs are available to the customer without any commitment to gamble. These are accessible directly from the main game page via a 'Help' button.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 5 Result determination (3.5:1, 3.5A:1)   |
| <b>Requirement:</b> | <p>To ensure that the gambling system implements the operator's rules, game rules and betting rules as they are described to the customer.</p> <p>All reasonable steps should be taken to ensure that gambles are accepted, processed and settled in accordance with the operator's published terms and rules, and the rules of the specific game, event, or bet.</p> |
| <b>Assessment:</b>  | Each game has been tested against the published rules, including acceptance of bets and payouts in accordance with the published terms and rules.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 5 Result determination (3.5:1, 3.5A:2)  |
| <b>Requirement:</b> | <p>To ensure that the gambling system implements the operator's rules, game rules and betting rules as they are described to the customer.</p> <p>Where unexpected system flaws, faults, or errors that affect the customer occur, steps are to be taken as soon as practicable to remedy the problem and ensure that the customer is treated fairly according to the circumstances.</p> |
| <b>Assessment:</b>  | In the event of any errors, an issue is raised, analysed and dealt with; either immediately, or after the logs and video analysis (playback) have been reviewed, as appropriate.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 5 Result determination (3.5:1, 3.5A.a)  |
| <b>Requirement:</b> | <p>To ensure that the gambling system implements the operator's rules, game rules and betting rules as they are described to the customer.</p> <p>a. Under normal operation, in the absence of technical faults, the system should act in accordance with the rules.</p> |
| <b>Assessment:</b>  | In the absence of any technical faults the system acts in accordance with the rules.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 5 Result determination (3.5:1, 3.5A.b)  |
| <b>Requirement:</b> | <p>To ensure that the gambling system implements the operator's rules, game rules and betting rules as they are described to the customer.</p> <p>b. Reasonable steps include testing of systems and new products against the published rules.</p> |
| <b>Assessment:</b>  | All games are internally tested by Evolution Gaming, and subsequently approved by an accredited testing facility prior to going live.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 5 Result determination (3.5:1, 3.5A.c)   |
| <b>Requirement:</b> | To ensure that the gambling system implements the operator's rules, game rules and betting rules as they are described to the customer.<br>c. Customers should be notified when errors that affect them, for example, incorrectly settled bets, have occurred as soon as practicable after the event occurs. Steps should be taken to rectify the error, for example, by manually adjusting the customer's account. |
| <b>Assessment:</b>  | In the event of any errors, an issue is raised, analysed and dealt with; either immediately, or after the logs and video analysis (playback) have been reviewed, as appropriate. If an error is reported, it is checked in reference to game logs, and - if upheld - the operator is advised to credit the customer in accordance with the findings.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7:1, 3.7A:1)  |
| <b>Requirement:</b> | To ensure that games and other virtual events operate fairly.<br>Random number generation and game results must be 'acceptably random'. Acceptably random here means that it is possible to demonstrate to a high degree of confidence that the output of the RNG, game, lottery and virtual event outcomes are random, through, for example, statistical analysis using generally accepted tests and methods of analysis. Adaptive behaviour (i.e. a compensated game) is not permitted. |
| <b>Assessment:</b>  | Random events are generated by industry standard, physical casino equipment. Evolution Gaming have processes in place which continually measure the output of their table games for randomness using live data for each individual table. NMI has reviewed samples of the output of these internal monitoring systems for table games, which indicates that outcomes are distributed in accordance with theoretical probabilities.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.a, 3.7A.a.i, 3.7A.a.ii, 3.7A.a.iii)   |
| <b>Requirement:</b> | a. RNG's should be capable of demonstrating the following qualities:<br>i. the output from the RNG is uniformly distributed over the entire output range and game, lottery, or virtual event outcomes are distributed in accordance with the expected/theoretical probabilities<br>ii. the output of the RNG, game, lottery, and virtual event outcomes should be unpredictable, for example, for a software RNG it should be computationally infeasible to predict what the next number will be without complete knowledge of the algorithm and seed value<br>iii. random number generation does not reproduce the same output stream (cycle), and that two instances of a RNG do not produce the same stream as each other (synchronise) |
| <b>Assessment:</b>  | Random events are generated by industry standard casino equipment operated by trained croupiers. Evolution Gaming have processes in place which continually measure the output of their table games for randomness using live data for each individual table. NMI has reviewed samples of the output of these internal monitoring systems.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.c, 3.7A.c.i)  |
| <b>Requirement:</b> | c. For games or virtual events that use the laws of physics to generate the outcome of the game (mechanical RNGs), the mechanical RNG used should be capable of meeting the requirements in a. where applicable and in addition:<br>i. the mechanical pieces should be constructed of materials to prevent decomposition of any component over time (e.g. a ball shall not disintegrate) |
| <b>Assessment:</b>  | The mechanical devices are sourced from a reputable manufacturer.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.c, 3.7A.c.ii)  |
| <b>Requirement:</b> | c. For games or virtual events that use the laws of physics to generate the outcome of the game (mechanical RNGs), the mechanical RNG used should be capable of meeting the requirements in a. where applicable and in addition:<br>ii. the properties of physical items used to choose the selection should not be altered |
| <b>Assessment:</b>  | The physical items are not altered in any way and are subject to daily cleaning and maintenance.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.c, 3.7A.c.iii)  |
| <b>Requirement:</b> | c. For games or virtual events that use the laws of physics to generate the outcome of the game (mechanical RNGs), the mechanical RNG used should be capable of meeting the requirements in a. where applicable and in addition:<br>iii. players should not have the ability to interact with, come into physical contact with, or manipulate the mechanics of the game. |
| <b>Assessment:</b>  | The devices are not physically accessible by the public. The player cannot manipulate the mechanics of the game in any way.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.d, 3.7B)   |
| <b>Requirement:</b> | d. Restricting adaptive behaviour prohibits automatic or manual interventions that change the probabilities of game outcomes occurring during play. Restricting adaptive behaviour is not intended to prevent games from offering bonus or special features that implement a different set of rules, if they are based on the occurrence of random events.<br>As far as is reasonably possible, games and events must be implemented fairly and in accordance with the rules and prevailing payouts, where applicable, as they are described to the customer. |
| <b>Assessment:</b>  | The games are implemented fairly and in accordance with the rules and prevailing payouts as they are described to the customer.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.d, 3.7B.a)  |
| <b>Requirement:</b> | d. Restricting adaptive behaviour prohibits automatic or manual interventions that change the probabilities of game outcomes occurring during play. Restricting adaptive behaviour is not intended to prevent games from offering bonus or special features that implement a different set of rules, if they are based on the occurrence of random events.<br>a. Games should implement the rules as described in the rules available to the customer before play commenced. |
| <b>Assessment:</b>  | The games implement the rules as described in the rules available to the customer before play commences.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.d, 3.7B.c, 3.7B.d)  |
| <b>Requirement:</b> | d. Restricting adaptive behaviour prohibits automatic or manual interventions that change the probabilities of game outcomes occurring during play. Restricting adaptive behaviour is not intended to prevent games from offering bonus or special features that implement a different set of rules, if they are based on the occurrence of random events.<br>c. When random numbers, scaled or otherwise, are received, e.g. following a game requesting a sequence of random numbers, they are to be used in the order in which they are received. For example, they may not be discarded due to adaptive behaviour.<br>d. Numbers or sequences of numbers are not to be discarded, unless they fall outside the expected range of numbers required by the virtual event – such an occurrence should result in an error being logged and investigated. |
| <b>Assessment:</b>  | The outcomes are always used and never discarded.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.d, 3.7C)   |
| <b>Requirement:</b> | d. Restricting adaptive behaviour prohibits automatic or manual interventions that change the probabilities of game outcomes occurring during play. Restricting adaptive behaviour is not intended to prevent games from offering bonus or special features that implement a different set of rules, if they are based on the occurrence of random events.<br>Game designs or features that may reasonably be expected to mislead the customer about the likelihood of particular results occurring are not permitted, including substituting losing events with near-miss losing events and simulations of real devices that do not simulate the real probabilities of the device. |
| <b>Assessment:</b>  | The game designs are not misleading. Near-miss losing events are not introduced and each game uses real devices associated with its game type.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.d, 3.7C.c)  |
| <b>Requirement:</b> | <p>d. Restricting adaptive behaviour prohibits automatic or manual interventions that change the probabilities of game outcomes occurring during play. Restricting adaptive behaviour is not intended to prevent games from offering bonus or special features that implement a different set of rules, if they are based on the occurrence of random events.</p> <p>c. Games may not falsely display near-miss results, that is, the event may not substitute one losing outcome with a different losing outcome.</p> |
| <b>Assessment:</b>  | The games do not falsely display near-miss results.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.d, 3.7C.e)  |
| <b>Requirement:</b> | <p>d. Restricting adaptive behaviour prohibits automatic or manual interventions that change the probabilities of game outcomes occurring during play. Restricting adaptive behaviour is not intended to prevent games from offering bonus or special features that implement a different set of rules, if they are based on the occurrence of random events.</p> <p>e. Where games involve an element of skill, every outcome described in the virtual event rules or artwork should be possible, that is, the customer should have some chance of achieving an advertised outcome regardless of skill.</p> |
| <b>Assessment:</b>  | In any game which involves an element of skill all outcomes are achievable.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.d, 3.7D, 3.7D.a, 3.7D.b)  |
| <b>Requirement:</b> | <p>d. Restricting adaptive behaviour prohibits automatic or manual interventions that change the probabilities of game outcomes occurring during play. Restricting adaptive behaviour is not intended to prevent games from offering bonus or special features that implement a different set of rules, if they are based on the occurrence of random events.</p> <p>The rules, payouts and outcome probabilities of a virtual event or game may not be changed while it is available for gambling, except as provided for in the rules of the game, lottery or virtual event. Such changes must be brought to customer's attention.</p> <p>a. Changes to game or event rules, paytables or other parameters that change the way in which a game, lottery, or event works, the winnings paid, or likelihood of winning (except as described in 7Dc.), should be conducted with the game or event taken offline or suspended.</p> <p>b. Altered games, lotteries, and events should display a notice that informs customers that the game or event has been changed, for example, 'rules changed', 'new odds', or 'different payouts'. The notice should be displayed on game selection screens and on the events themselves if it is possible for the customer to go straight to the event without using a selection screen.</p> |
| <b>Assessment:</b>  | The game architecture does not permit changes to the rules, payouts and outcome probabilities while game sessions are in play, nor at any other time.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7D.c, 3.7D.c.v)   |
| <b>Requirement:</b> | <p>c. This requirement is not intended to prevent games and virtual events where specified changes occur legitimately, in accordance with the game or event rules, for example:</p> <p>v. unspecified changes to rules, paytables or other parameters that change the way in which a game, lottery or event works are not permitted, for example, rules that state 'game rules may be changed at any time' would not be acceptable.</p> |
| <b>Assessment:</b>  | The game architecture does not permit changes to the rules, payouts and outcome probabilities while game sessions are in play, nor at any other time.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7D.c, 3.7E:1)   |
| <b>Requirement:</b> | <p>c. This requirement is not intended to prevent games and virtual events where specified changes occur legitimately, in accordance with the game or event rules, for example:</p> <p>Except in the case of subscription lotteries, the system must be designed to clearly and accurately display the result of the game or event and the customer's gamble. The result must be displayed for a length of time that may reasonably be expected to be sufficient for the customer to understand the result of the game or event in the context of their gamble.</p> |
| <b>Assessment:</b>  | The result is displayed for a length of time that is considered sufficient for the customer to understand the result of the game in the context of their gamble.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7D.c, 3.7E:2)   |
| <b>Requirement:</b> | <p>c. This requirement is not intended to prevent games and virtual events where specified changes occur legitimately, in accordance with the game or event rules, for example:</p> <p>The game artwork and text should be sufficient to provide the customer with all of the information required to determine whether they have lost or won, and the value of any winnings.</p> |
| <b>Assessment:</b>  | The game artwork and text is sufficient to provide the customer with all of the information required to determine whether they have lost or won, and the value of any winnings.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 11 Limiting collusion/cheating (3.11:1, 3.11A)  |
| <b>Requirement:</b> | <p>To reduce the risk that cheating or collusion by players unfairly disadvantages another player.</p> <p>Measures intended to deter, prevent, and detect collusion and cheating must be implemented. Gambling systems must retain a record of relevant activities to facilitate investigation and be capable of suspending or disabling player accounts or player sessions.</p> |
| <b>Assessment:</b>  | All video logs are kept for anywhere up to 6 months in case of suspicious activities. Player (game history) logs are stored for up to 7 years. Risk monitoring and money laundering assistance is provided by Evolution Gaming, but it is the operator's responsibility to detect any suspicious behaviour.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 11 Limiting collusion/cheating (3.11A.b, 3.11A.b.i, 3.11A.b.ii, 3.11A.b.iii)   |
| <b>Requirement:</b> | <p>b. Relevant activities to be recorded will vary by game but may include:</p> <ul style="list-style-type: none"><li>i. which players played at which tables</li><li>ii. the amounts won from and lost to accounts</li><li>iii. game activities to an individual bet/action level.</li></ul> |
| <b>Assessment:</b>  | This information is kept as part of the player's history in the back-office logs.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 11 Limiting collusion/cheating (3.11A.c, 3.11A.c.i)   |
| <b>Requirement:</b> | <p>c. Where appropriate, prevention measures may include:</p> <ul style="list-style-type: none"><li>i. taking steps to prevent a player from occupying more than one seat at any individual table.</li></ul> |
| <b>Assessment:</b>  | These games are not P2P games. It is only possible to occupy more than one seat on Blackjack tables where it is not possible to disadvantage other players by occupying extra seats.                         |

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| <b>Reference:</b>   | UK_RTS / RTS - 11 Limiting collusion/cheating (3.11A.d, 3.11A.d.i)   |
| <b>Requirement:</b> | d. Detection measures may include, detecting and investigating the following, where appropriate:<br>i. players who frequently share the same tables  |
| <b>Assessment:</b>  | Evolution Gaming have detection tools in place which search for particular betting patterns including (but not limited to) advantage play, sector betting, card counting, shuffle tracking, opposite betting and sequencing. |

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| <b>Reference:</b>   | UK_RTS / RTS - 11 Limiting collusion/cheating (3.11A.d, 3.11A.d.iii)   |
| <b>Requirement:</b> | d. Detection measures may include, detecting and investigating the following, where appropriate:<br>iii. suspicious patterns of play (such as chip dumping).   |
| <b>Assessment:</b>  | Evolution Gaming have detection tools in place which search for particular betting patterns including (but not limited to) advantage play, sector betting, card counting, shuffle tracking, opposite betting and sequencing. |

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| <b>Reference:</b>   | UK_RTS / RTS - Time requirements and reality checks (3.13:1, 3.13A, 3.13A.a)  |
| <b>Requirement:</b> | To provide customers with facilities to assist them to keep track of the time they spend gambling.<br>Where the gambling system uses full screen client applications that obscure the clock on the customer's device the client application itself must display the time of day or the elapsed time since the application was started, wherever practicable.<br>a. Time of day should either be taken from the customer's own device or 'server time' and should be displayed in hours and minutes. |
| <b>Assessment:</b>  | A clock is displayed within the game that is clearly visible to the customer. This clock is refreshed as each new game is cycled to show the correct time. The clock displays the time in hours:minutes:seconds format (GMT), taken from the game server.   |

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| <b>Reference:</b>   | UK_RTS / RTS - Time requirements and reality checks (3.13:1, 3.13A.d)   |
| <b>Requirement:</b> | To provide customers with facilities to assist them to keep track of the time they spend gambling.<br>d. For restricted display devices, time of day or elapsed time should be displayed where the device supports it.                                    |
| <b>Assessment:</b>  | A clock is displayed within the game that is clearly visible to the customer. This clock is refreshed as each new game is cycled to show the correct time. The clock displays the time in hours:minutes:seconds format (GMT), taken from the game server. |

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| <b>Reference:</b>   | IPA / IPA 6 – Interrupted gambling (4.6, 4.6:1)  |
| <b>Requirement:</b> | Gaming (including bingo), betting on virtual events, and peer-to-peer betting<br>To inform customers about the operator's policies with regard to service interruptions and how they are likely to be treated if interruption occurs so that they may make an informed decision about whether to gamble and in what way.   |
| <b>Assessment:</b>  | The games cannot have incomplete games due to their "real time" nature. If the player exits the game after the bets have closed the rest of the game will play out without the player and any winnings will be awarded. If the player exits the game before making this decision the stake is lost and the game is void. The rules state that if a player does not make a decision within the allotted time they will be deemed not to require any further action. |

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| <b>Reference:</b>   | IPA / IPA 6 – Interrupted gambling (4.6, 4.6A.a)   |
| <b>Requirement:</b> | Gaming (including bingo), betting on virtual events, and peer-to-peer betting<br>a. Operators should make information available to customers about how they will be treated in various common scenarios. However, this does not mean that operators have to detail all possible scenarios or responses to service interruptions.   |
| <b>Assessment:</b>  | The games cannot have incomplete games due to their "real time" nature. If the player exits the game after the bets have closed the rest of the game will play out without the player and any winnings will be awarded. If the player exits the game before making this decision the stake is lost and the game is void. The rules state that if a player does not make a decision within the allotted time they will be deemed not to require any further action. |

## Appendix B: Requirements Not Applicable

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| <b>Reference:</b>   | UK_RTS / RTS - 2 Displaying transactions (3.2A.c, 3.2A.c.ii)   |
| <b>Requirement:</b> | c. Information about the value of the gamble should be displayed including, as appropriate:<br>ii. entry fees, for example, payment for entry to poker tournaments |
| <b>Assessment:</b>  | None of the games tested are tournament games.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 2 Displaying transactions (3.2A.c, 3.2A.c.iii, 3.2A.d)   |
| <b>Requirement:</b> | c. Information about the value of the gamble should be displayed including, as appropriate:<br>iii. the price of lottery tickets and the number of draws entered.<br>d. For subscription lotteries, sending a confirmation by email or post and/or displaying the stake and the number of draws entered when the customer subscribes is sufficient. |
| <b>Assessment:</b>  | None of the games tested are lottery based.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 2 Displaying transactions (3.2B.a:1, 3.2B.b)   |
| <b>Requirement:</b> | These items, where relevant, are required on applications designed for use on restricted display devices.<br>b. For telephone gambling the content of the customer's bet should be read back to them before the bet is confirmed. |
| <b>Assessment:</b>  | Telephone gambling is not offered.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 2 Displaying transactions (3.2B.a:1, 3.2B.c)  |
| <b>Requirement:</b> | These items, where relevant, are required on applications designed for use on restricted display devices.<br>c. Where the customer is able to choose, through the use of a third party user-interface, to override the display of this information, this must not be the default option. That is, the customer must make an active choice not to have the information available or to install a user-interface that does not contain the information. The remote gambling system should continue to make available or send the information to the customer; it should not assume that the information is not required. |
| <b>Assessment:</b>  | All games have been tested in isolation on Evolution Gaming's test site.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 2 Displaying transactions (3.2B.a:1, 3.2B.d)  |
| <b>Requirement:</b> | These items, where relevant, are required on applications designed for use on restricted display devices.<br>d. For subscription lotteries, sending a confirmation by email or post and/or displaying the first draw and the number of draws for which the customer will be entered is sufficient. |
| <b>Assessment:</b>  | None of the games tested are lottery based.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3A.d, 3.3A.d.v)  |
| <b>Requirement:</b> | d. The following items provide guidelines on the type of explanatory content that may be relevant and should be considered for inclusion:<br>v. whether there are contributions to jackpots (progressives) and the way in which the jackpot operates, for example, whether the jackpot is won by achieving a particular outcome |
| <b>Assessment:</b>  | The games do not offer progressive jackpots.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3A.d, 3.3A.d.vii)   |
| <b>Requirement:</b> | d. The following items provide guidelines on the type of explanatory content that may be relevant and should be considered for inclusion:<br>vii. rules pertaining to metamorphosis of games, for example, the number and type of tokens that need to be collected in order to qualify for a feature or bonus round and the rules and behaviour of the bonus round |
| <b>Assessment:</b>  | These are not metamorphic games.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3A.d, 3.3A.d.viii)  |
| <b>Requirement:</b> | d. The following items provide guidelines on the type of explanatory content that may be relevant and should be considered for inclusion:<br>viii. the rules for entering a single lottery draw or a series of lottery draws and the frequency of the draws. |
| <b>Assessment:</b>  | None of the games tested are lottery based.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3B:1, 3.3B:1.a)   |
| <b>Requirement:</b> | The following items provide guidelines on the type of information that may be relevant.<br>a. Where a game builds up a collection of tokens (symbols etc), the current number collected. |
| <b>Assessment:</b>  | Tokens are not awarded.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3B:1, 3.3B:1.b)   |
| <b>Requirement:</b> | The following items provide guidelines on the type of information that may be relevant.<br>b. An indication of which rules are currently relevant, such as displaying 'bonus round' or other feature labels. |
| <b>Assessment:</b>  | The games do not have bonus rounds per se.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3C.a, 3.3C.a.i)   |
| <b>Requirement:</b> | a. The following items provide further guidance on acceptable types of information about the likelihood of winning:<br>i. for types of peer-to-peer games where the likelihood of winning may depend on skill and/or the actions of other participants, a description of the way the game works and how winners are determined will be sufficient; |
| <b>Assessment:</b>  | These are not peer-to-peer games.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3C.a, 3.3C.a.ii)  |
| <b>Requirement:</b> | a. The following items provide further guidance on acceptable types of information about the likelihood of winning:<br>ii. for bingo, and some types of lottery or other games where it is not possible to determine the likelihood of winning because it depends on the eventual number of participants, a description of the way in which prizes are allocated will be sufficient. |
| <b>Assessment:</b>  | These are not bingo games.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3C.a, 3.3D.b)   |
| <b>Requirement:</b> | <p>a. The following items provide further guidance on acceptable types of information about the likelihood of winning:</p> <p>b. For peer-to-peer games where the prize is determined based on the actions of the participants, a description of the way the game works and the rake or commission taken will be sufficient.</p> |
| <b>Assessment:</b>  | These are not peer-to-peer games.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3C.a, 3.3D.c)   |
| <b>Requirement:</b> | <p>a. The following items provide further guidance on acceptable types of information about the likelihood of winning:</p> <p>c. For lotteries and other types of events where the potential amount or prize paid out may not be known before the customer commits to gamble, describing the way in which the prize amount is determined will be sufficient.</p> |
| <b>Assessment:</b>  | These are not lottery games. The potential prizes are known before the customer commits to their gamble.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 3 Rules, game descriptions and the likelihood of winning (3.3C.a, 3.3D.f)  |
| <b>Requirement:</b> | <p>a. The following items provide further guidance on acceptable types of information about the likelihood of winning:</p> <p>f. Displays of jackpot amounts that change over time ('progressives') should be updated as frequently as practicable, particularly after the amount has been reset following a win.</p> |
| <b>Assessment:</b>  | The games do not offer progressive jackpots.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 4 Time-critical events (3.4:1, 3.4A)   |
| <b>Requirement:</b> | <p>To reduce the risk that customers are unfairly disadvantaged by technical factors that may affect speed of response, where response time has a significant impact on the likelihood of winning.</p> <p>Where speed of interaction has a significant effect on the customer's chance of winning, operators must assess the level of risk and demonstrate to the Commission that they are taking reasonable steps to reduce the risk to customers.</p> |
| <b>Assessment:</b>  | Speed of interaction does not have an effect on the customer's chance of winning.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 4 Time-critical events (3.4A:1, 3.4A:1.a, 3.4A:1.b, 3.4A:1.c)  |
| <b>Requirement:</b> | <p>Examples of possible approaches include:</p> <p>a. estimating the degree of network latency (delay) a customer is experiencing and displaying regularly updated information to the customer about any disadvantage that they may be operating under (e.g. high, medium, low)</p> <p>b. applying a handicapping system based on estimated performance and/or system latency</p> <p>c. treating winning responses that arrive within a period of time as simultaneous and implementing a policy on how simultaneous wins are to be dealt with.</p> |
| <b>Assessment:</b>  | Speed of interaction does not have an effect on the customer's chance of winning.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 6 Result determination for play-for-fun games (3.6:1, 3.6A, 3.6A.a)  |
| <b>Requirement:</b> | <p>To minimise the risk that customers are misled about the likelihood of winning due to the behaviour of play-for-fun games. Play-for-fun games must implement the same game rules as the corresponding play-for-money games. Operators must take all reasonable steps to ensure that play-for-fun games accurately represent the likelihood of winning and prize distribution in the play-for-money game. For the purpose of this requirement playing a game includes participating in a lottery and/or betting on a virtual event.</p> <p>a. The play-for-free game should use the same RNG as the corresponding play-for-money games, another RNG that fulfils the requirements set out in RTS requirement 7A, or a publicly available RNG, (such as those available as standard within operating systems) that may reasonably be expected to produce no systematic bias.</p> |
| <b>Assessment:</b>  | "Play for fun" games are not offered.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 6 Result determination for play-for-fun games (3.6A.b, 3.6A.b.i, 3.6A.b.ii, 3.6A.c)   |
| <b>Requirement:</b> | <p>b. Where 6a is not reasonably possible, it should be demonstrated that the method of producing outcomes does not introduce a systematic bias, for example:</p> <p>i. if tables of random numbers are used, they should be sufficiently long to support a large number of games without repeating</p> <p>ii. the method should represent game probabilities accurately, ie it should not produce a higher than expected proportion of winning outcomes.</p> <p>c. The prize distribution should accurately represent the play-for-money game. For example, where play-for-fun games use virtual cash, the virtual cash payouts should be the same as the corresponding play-for-money game, and where tokens are used, the allocation of tokens as prizes should be proportionate to the stakes and prizes in the play-for-money game.</p> |
| <b>Assessment:</b>  | "Play for fun" games are not offered.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7:1, 3.7A:2)  |
| <b>Requirement:</b> | <p>To ensure that games and other virtual events operate fairly.</p> <p>Where lotteries use the outcome of other events external to the lottery, to determine the result of the lottery (for example, using numbers from the National Lottery) the outcome must be unpredictable and externally verifiable.</p> |
| <b>Assessment:</b>  | The games are not lottery based.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.a, 3.7A.a.iv, 3.7A.a.v)  |
| <b>Requirement:</b> | <p>a. RNG's should be capable of demonstrating the following qualities:</p> <p>iv. any forms of seeding and re-seeding used do not introduce predictability</p> <p>v. any scaling applied to the output of the random number generator maintains the qualities above.</p> |
| <b>Assessment:</b>  | No form of seeding is used.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.b, 3.7A.b.i, 3.7A.b.ii, 3.7A.b.iii)  |
| <b>Requirement:</b> | <p>b. For lotteries using external events - where it is not practical to demonstrate 7a. - the events outcomes should be:</p> <p>i. unpredictable, that is, events should be selected only where they may reasonably be assumed to be random events</p> <p>ii. unable to be influenced by the lottery operator (or external lottery manager)</p> <p>iii. publicly available and externally verifiable, for example, events that are published in local or national press would be acceptable.</p> |
| <b>Assessment:</b>  | The games are not lottery based.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.d, 3.7B.b)   |
| <b>Requirement:</b> | <p>d. Restricting adaptive behaviour prohibits automatic or manual interventions that change the probabilities of game outcomes occurring during play. Restricting adaptive behaviour is not intended to prevent games from offering bonus or special features that implement a different set of rules, if they are based on the occurrence of random events.</p> <p>b. The mapping of the random inputs to game outcomes should be in accordance with prevailing probabilities, pay tables, etc.</p> |
| <b>Assessment:</b>  | The games produce actual outcomes. No mapping from random numbers takes place.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.d, 3.7C.a, 3.7C.b)   |
| <b>Requirement:</b> | <p>d. Restricting adaptive behaviour prohibits automatic or manual interventions that change the probabilities of game outcomes occurring during play. Restricting adaptive behaviour is not intended to prevent games from offering bonus or special features that implement a different set of rules, if they are based on the occurrence of random events.</p> <p>a. Where a virtual event simulates a physical device, the theoretical game probabilities should match the probabilities of the real device (for example, the probability of a coin landing heads must be 0.5 every time the coin is tossed).</p> <p>b. Where multiple physical devices are simulated the probabilities of each outcome should be independent of the other simulated devices.</p> |
| <b>Assessment:</b>  | These are not virtual games.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.d, 3.7C.d)  |
| <b>Requirement:</b> | <p>d. Restricting adaptive behaviour prohibits automatic or manual interventions that change the probabilities of game outcomes occurring during play. Restricting adaptive behaviour is not intended to prevent games from offering bonus or special features that implement a different set of rules, if they are based on the occurrence of random events.</p> <p>d. Where the event requires a pre-determined layout (for example, hidden prizes on a map), the locations of the winning spots should not change during play, except as provided for in the rules of the game.</p> |
| <b>Assessment:</b>  | The games do not require pre-determined layouts.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7A.d, 3.7C.f)   |
| <b>Requirement:</b> | <p>d. Restricting adaptive behaviour prohibits automatic or manual interventions that change the probabilities of game outcomes occurring during play. Restricting adaptive behaviour is not intended to prevent games from offering bonus or special features that implement a different set of rules, if they are based on the occurrence of random events.</p> <p>f. Where a customer contributes to a jackpot pool, that customer should be eligible to win the jackpot whilst they are playing that game, in accordance with the game and jackpot rules.</p> |
| <b>Assessment:</b>  | The games do not offer progressive jackpots.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7D.c, 3.7D.c.i, 3.7D.c.ii)   |
| <b>Requirement:</b> | <p>c. This requirement is not intended to prevent games and virtual events where specified changes occur legitimately, in accordance with the game or event rules, for example:</p> <p>i. virtual events, such as virtual racing products where the odds differ from event to event depending on the virtual runners</p> <p>ii. virtual games, such as bingo where the odds of winning are dependent on the number of entrants</p> |
| <b>Assessment:</b>  | The games are not based on virtual events.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7D.c, 3.7D.c.iii)  |
| <b>Requirement:</b> | c. This requirement is not intended to prevent games and virtual events where specified changes occur legitimately, in accordance with the game or event rules, for example:<br>iii. games with progressive jackpots, where the amount that can be won changes over time |
| <b>Assessment:</b>  | The games do not offer progressive jackpots.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 7 Generation of random outcomes (3.7D.c, 3.7D.c.iv)  |
| <b>Requirement:</b> | c. This requirement is not intended to prevent games and virtual events where specified changes occur legitimately, in accordance with the game or event rules, for example:<br>iv. games with bonus rounds where different rules apply, so long as these rounds are properly described to the customer |
| <b>Assessment:</b>  | The games do not offer bonus rounds.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 8 Auto-play functionality (3.8A, 3.8A.a, 3.8A.a.i, 3.8A.a.ii, 3.8A.a.iii, 3.8A.b, 3.8A:1, 3.8A:a)  |
| <b>Requirement:</b> | The gambling system must provide easily accessible facilities that:<br>(a) make available the following three controls, each of which stops auto-play functionality when it is triggered-<br>(i) 'loss limit', ie where the player selects an option to not lose more than X from their starting balance, where X is an amount that can be selected by the player. A 'loss' in this context equates to accumulated auto-play bets minus accumulated auto-play wins.<br>(ii) 'single win limit' ie single win greater than Y where Y is an amount that can be selected by the player and<br>(iii) 'jackpot win' (where applicable).<br>(b) require auto-play to be implemented in such a way that each time a customer chooses to use auto-play they must select the stake, the number of auto-play gambles and at least the first of the above three controls.<br>The number of auto-play gambles must not exceed 100 in one batch. During auto-play the customer must be able to stop the auto-play regardless of how many auto-play gambles they initially chose or how many remain.<br>a. Auto-play should not override any of the display requirements (for example, the result of each gamble must be displayed for a reasonable length of time before the next gamble commences, as set out in RTS 7E). |
| <b>Assessment:</b>  | Autoplay facilities are not provided.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 9 Skill and chance games with auto-play (3.9:1, 3.9A)   |
| <b>Requirement:</b> | To minimise the risk that auto-play functionality disadvantages a customer or that autoplay or other strategy advice is misleading. Strategy advice and auto-play functionality must be fair, not misleading and must not represent a poor choice. |
| <b>Assessment:</b>  | Autoplay facilities are not provided.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 9 Skill and chance games with auto-play (3.9A.a, 3.9A.a.i, 3.9A.a.ii)  |
| <b>Requirement:</b> | a. In implementing this control, the following should be considered, where appropriate:<br>i. if there is a standard strategy, for example, for well known games like blackjack, the standard strategy should be used<br>ii. strategies or auto-play should (theoretically) produce at least the average Return to Player (RTP) for the game over time. |
| <b>Assessment:</b>  | Autoplay facilities are not provided.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 10 Interrupted gambling (3.10:1, 3.10A)   |
| <b>Requirement:</b> | To ensure that customers are treated fairly in the event of interrupted play or betting and that they are aware of how they will be treated if interruptions occur.<br>Operators must take all reasonable steps to ensure that their policies for instigating or dealing with service interruptions are fair and do not systematically disadvantage customers.   |
| <b>Assessment:</b>  | The games cannot have incomplete games due to their "real time" nature. If the player exits the game after the bets have closed the rest of the game will play out without the player and any winnings will be awarded. If the player exits the game before making this decision the stake is lost and the game is void. The rules state that if a player does not make a decision within the allotted time they will be deemed not to require any further action; e.g. an automatic "stand" in Blackjack. |

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| <b>Reference:</b>   | UK_RTS / RTS - 10 Interrupted gambling (3.10A.a, 3.10A.a.i, 3.10A.a.ii, 3.10A.a.iii, 3.10A.a.iv)   |
| <b>Requirement:</b> | a. For gaming the following policies should be applied:<br>i. where an interruption occurs after the operator receives notification of the customer's gamble and where the customer can have no further influence on the outcome of the event or gamble the results of the gamble should stand<br>ii. where an interruption to a single-participant single stage event occurs before an outcome has been generated the customer should have any deducted stake returned to their balance<br>iii. for stateful games (games where there are multiple stages or decision points), all reasonable steps should be taken to restore the game to its last known state to enable the customer to complete the game<br>iv. games with multiple participants (equal chance or otherwise) should be dealt with fairly on a case-by-case basis |
| <b>Assessment:</b>  | The games cannot have incomplete games due to their "real time" nature. If the player exits the game after the bets have closed the rest of the game will play out without the player and any winnings will be awarded. If the player exits the game before making this decision the stake is lost and the game is void. The rules state that if a player does not make a decision within the allotted time they will be deemed not to require any further action; e.g. an automatic "stand" in Blackjack.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 10 Interrupted gambling (3.10A.a, 3.10A.a.v)   |
| <b>Requirement:</b> | a. For gaming the following policies should be applied:<br>v. progressive jackpot values should be restored to their pre-failure state. |
| <b>Assessment:</b>  | The games do not offer progressive jackpots.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 10 Interrupted gambling (3.10A.b, 3.10A.b.i)  |
| <b>Requirement:</b> | b. For peer-to-peer betting the following policies should be applied:<br>i. where a service interruption is caused by failures in the gambling system, operators should suspend betting on all betting markets that have been affected by a significant event before service is restored |
| <b>Assessment:</b>  | These are not peer-to-peer games.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 10 Interrupted gambling (3.10A.b.ii, 3.10B)   |
| <b>Requirement:</b> | ii. other failures should be dealt with fairly on a case-by-case basis.<br>Systems must be capable of recovering from failures that cause interruptions to gambling, including where appropriate, the capability to void gambles (with or without manual intervention), the capability to suspend betting markets, and taking all reasonable steps to retain sufficient information to be able to restore events to their pre-failure state.                       |
| <b>Assessment:</b>  | The games cannot have incomplete games due to their "real time" nature. If the player exits the game after the bets have closed the rest of the game will play out without the player and any winnings will be awarded. If the player exits the game before making this decision the stake is lost and the game is void. The rules state that if a player does not make a decision within the allotted time they will be deemed not to require any further action. |

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| <b>Reference:</b>   | UK_RTS / RTS - 10 Interrupted gambling (3.10B.a, 3.10B.a.i)  |
| <b>Requirement:</b> | a. For gaming the system should:<br>i. be capable of voiding gambles and restoring the amount gambled to the customer automatically, or in conjunction with manual operational controls; and   |
| <b>Assessment:</b>  | The games cannot have incomplete games due to their "real time" nature. If the player exits the game after the bets have closed the rest of the game will play out without the player and any winnings will be awarded. If the player exits the game before making this decision the stake is lost and the game is void. The rules state that if a player does not make a decision within the allotted time they will be deemed not to require any further action; e.g. an automatic "stand" in Blackjack. |

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| <b>Reference:</b>   | UK_RTS / RTS - 10 Interrupted gambling (3.10B.a.ii, 3.10B.a.ii:1, 3.10B.a.ii:2, 3.10B.a.ii:3, 3.10B.a.ii:4, 3.10B.a.ii:5, 3.10B.a.ii:6)   |
| <b>Requirement:</b> | ii. implement all reasonable measures to maintain sufficient information to be capable of automatically restoring an event to its pre-failure state so that it may be completed by the customer. The following information should be restored, as appropriate: <ul style="list-style-type: none"> <li>• the state of a deck of cards, and any hands that have been dealt</li> <li>• number of tokens collected</li> <li>• any other predetermined information, such as maps or prize layouts</li> <li>• the value of any progressive jackpots</li> <li>• the state of any gambles, e.g. who has staked what on what outcome</li> <li>• bets placed or offered.</li> </ul> |
| <b>Assessment:</b>  | The games cannot have incomplete games due to their "real time" nature. If the player exits the game after the bets have closed the rest of the game will play out without the player and any winnings will be awarded. If the player exits the game before making this decision the stake is lost and the game is void. The rules state that if a player does not make a decision within the allotted time they will be deemed not to require any further action.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 10 Interrupted gambling (3.10B.a.ii, 3.10B.b)   |
| <b>Requirement:</b> | ii. implement all reasonable measures to maintain sufficient information to be capable of automatically restoring an event to its pre-failure state so that it may be completed by the customer. The following information should be restored, as appropriate:<br>b. For peer-to-peer betting, it should be possible to suspend betting markets manually or automatically. |
| <b>Assessment:</b>  | These are not peer-to-peer games.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 12 Financial limits (3.12, 3.12A.a)   |
| <b>Requirement:</b> | To provide customers with facilities that may assist them in sticking to their personal budgets for gambling with the operator.<br>a. For telephone gambling (except lotteries), customers should be asked if they would like to set a deposit or spend limit when they register. Customers should be able to request a limit at any point after registration. The limit should be implemented as soon as practicable after the customer's request. The customer should be informed when the limit will come into force. |
| <b>Assessment:</b>  | These games do not offer telephone gambling.   |

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| <b>Reference:</b>   | UK_RTS / RTS - Time requirements and reality checks (3.13:1, 3.13A.c)   |
| <b>Requirement:</b> | To provide customers with facilities to assist them to keep track of the time they spend gambling.<br>c. Elapsed time should be displayed in minutes and hours. |
| <b>Assessment:</b>  | The game displays the actual time in minutes, hours and seconds (not the elapsed time).   |

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| <b>Reference:</b>   | UK_RTS / RTS - Time requirements and reality checks (3.13:1, 3.13A.e)   |
| <b>Requirement:</b> | To provide customers with facilities to assist them to keep track of the time they spend gambling.<br>e. In addition, customers may be offered the ability to set a session or game-play duration reminder. |
| <b>Assessment:</b>  | This option is not made available to the customer.  |

## Appendix C: Applicable Requirements Not In Scope

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| <b>Reference:</b>   | UK_RTS / RTS - 1 Customer account information (3.1:1, 3.1A, 3.1A.a, 3.1B, 3.1B.a, 3.1B.b)  |
| <b>Requirement:</b> | <p>To provide customers with easily accessible information about their current balances.</p> <p>Where customers hold a credit or debit balance, the pages or screens used to move money into and out of accounts or products must be designed to display the customer's current account or product balance, either in the currency of their account or the currency of the gambling product (e.g. dollars, euros or pounds sterling), whenever that customer is logged in. For telephone betting this information is to be delivered at the customer's request by the customer service agent or automated response system.</p> <p>a. Where funds are moved between products (for example, from a betting product to a gaming product) the balance does not necessarily have to represent all of the balances that a customer may hold with an operator in respect of those products.</p> <p>Where customers hold a credit or debit balance, the pages or screens used for gambling must be designed to display the customer's current account or product balance, or where this is not practical to display a link to a page or screen that shows the balance, whenever that customer is logged in. Balances are to be presented either in the currency of the customer's account or the currency of the gambling product (e.g. dollars, euros or pounds sterling). For telephone betting this information is to be delivered at the customer's request by the customer service agent or automated response system.</p> <p>a. Where funds are moved between products, the balance does not necessarily have to represent all of the balances that a customer may hold with an operator in respect of other products.</p> <p>b. Gambling pages and screens include virtual game pages, sports betting coupons, and poker and other virtual gaming 'tables'.</p> |
| <b>Assessment:</b>  | As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 11 Limiting collusion/cheating (3.11A.d, 3.11A.d.ii)   |
| <b>Requirement:</b> | <p>d. Detection measures may include, detecting and investigating the following, where appropriate:</p> <p>ii. players from same address who share the same table</p> |
| <b>Assessment:</b>  | As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.   |

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| <b>Reference:</b>   | UK_RTS / RTS - 11 Limiting collusion/cheating (3.11A.d, 3.11A.e)   |
| <b>Requirement:</b> | <p>d. Detection measures may include, detecting and investigating the following, where appropriate:</p> <p>e. Customer complaints about cheating should be investigated.</p> |
| <b>Assessment:</b>  | As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 12 Financial limits (3.12, 3.12A:1)   |
| <b>Requirement:</b> | <p>To provide customers with facilities that may assist them in sticking to their personal budgets for gambling with the operator.</p> <p>The gambling system must provide easily accessible facilities that make it possible for customers to impose their own financial limits. Customers must be given the opportunity to set a limit as part of the registration process (or at the point at which the customer makes the first deposit or payment).</p> |
| <b>Assessment:</b>  | As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 12 Financial limits (3.12, 3.12A.b)   |
| <b>Requirement:</b> | <p>To provide customers with facilities that may assist them in sticking to their personal budgets for gambling with the operator.</p> <p>b. For other access media (including internet, interactive TV and mobile), customers should be offered the opportunity to select a deposit/spend limit from a list which may contain a 'no limit' option or to enter a limit of their choice as part of the registration or first deposit process. The 'no limit' option should not be the default option.</p> |
| <b>Assessment:</b>  | As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 12 Financial limits (3.12A.c, 3.12A.c.i, 3.12A.c.ii, 3.12A.c.iii)   |
| <b>Requirement:</b> | <p>c. Limits could be in the form of:</p> <ul style="list-style-type: none"> <li>i. deposit limits: where the amount a customer deposits into their account is limited over a particular duration</li> <li>ii. spend limits: where the amount a customer spends on gambling (or specific gambling products) is restricted for a given period – this type of limit may be appropriate where the customer does not hold a deposit account with the operator</li> <li>iii. loss limits: where the amount lost (ie winnings subtracted from the amount spent) is restricted (for instance when a customer makes a £10 bet and wins £8, the loss is £2).</li> </ul> |
| <b>Assessment:</b>  | As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 12 Financial limits (3.12A.d, 3.12A.d.i, 3.12A.d.ii, 3.12A.d.iii)   |
| <b>Requirement:</b> | <p>d. The period/duration of the limits on offer should include:</p> <ul style="list-style-type: none"> <li>i. 24 hours.</li> <li>ii. 7 days; and</li> <li>iii. one month</li> </ul> |
| <b>Assessment:</b>  | As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 12 Financial limits (3.12A.e, 3.12A.e.i, 3.12A.e.ii, 3.12A.e.iii, 3.12A.e.iv, 3.12B, 3.12B.a)  |
| <b>Requirement:</b> | <p>e. In addition</p> <ul style="list-style-type: none"> <li>i. limits may be implemented per customer, per account, or other means</li> <li>ii. limits could also be implemented across all products or channels or for individual products or channels</li> <li>iii. financial limit facilities should be provided via a link on the home page</li> <li>iv. facilities should be available on deposit pages/screens or via a link on these pages/screens</li> </ul> <p>All reasonable steps must be taken to ensure that customer-led limits are only increased at the customer's request, only after a cooling-off period of 24 hours has elapsed and only once the customer has taken positive action at the end of the cooling off period to confirm their request.</p> <p>a. Where possible (for instance, unless systems/technical failures prevent it) limit reductions are to be implemented within 24 hours of the request being received. In addition, at the point at which the customer requests a decrease in their limit, they should be informed when the limit reduction will take effect.</p> |
| <b>Assessment:</b>  | As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.   |

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| <b>Reference:</b>   | UK_RTS / RTS - Time requirements and reality checks (3.13:1, 3.13A.b)   |
| <b>Requirement:</b> | <p>To provide customers with facilities to assist them to keep track of the time they spend gambling.</p> <p>b. Operators will not be expected to detect whether or not customers have hidden their clocks.</p> |
| <b>Assessment:</b>  | This requirement is the responsibility of the operator.   |

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| <b>Reference:</b>   | UK_RTS / RTS - Time requirements and reality checks (3.13B, 3.13B:1, 3.13B:a, 3.13B:b, 3.13B:c, 3.13B:d)  |
| <b>Requirement:</b> | <p>The below additions to this provision come into effect on 30 April 2016</p> <p>The gambling system must provide easily accessible facilities that make it possible for customers to set a frequency at which they will receive and see on the screen a reality check within a gaming session. A 'reality check' means a display of the time elapsed since the session began. The customer must acknowledge the reality check for it to be removed from the screen.</p> <p>a. The customer should be offered the opportunity to set a reality check and select a frequency at which the reality check will appear on the screen prior to commencing game play. The customer should be offered a range of time periods from which to select.</p> <p>b. The reality check should continue to appear at the selected time intervals until the customer's gaming session ends.</p> <p>c. The reality check should offer the facility to exit the gambling session.</p> <p>d. The reality check should provide a link to the customer's account history.</p> |
| <b>Assessment:</b>  | As a B2B provider Evolution Gaming do not manage reality checks. This requirement is the responsibility of the operator.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 14 Responsible product design (3.14:1, 3.14A)   |
| <b>Requirement:</b> | <p>To ensure that products are designed responsibly and to minimise the likelihood that they exploit or encourage problem gambling behaviour.</p> <p>Gambling products must not actively encourage customers to chase their losses, increase their stake or increase the amount they have decided to gamble, or continue to gamble after they have indicated that they wish to stop.</p> |
| <b>Assessment:</b>  | As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.  |

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| <b>Reference:</b>   | UK_RTS / RTS - 14 Responsible product design (3.14A.a, 3.14A.a.i, 3.14A.a.ii, 3.14A.a.iii, 3.14A.b)   |
| <b>Requirement:</b> | <p>a. By actively encourage, we mean the inclusion of specific features, functions or information that could reasonably be expected to encourage a greater likelihood of the behaviours described occurring. For example:</p> <p>i. the amount of funds taken into a product should not be topped up without the customer choosing to do so on each occasion, e.g. when a customer buys-in at a poker table they should have to choose to purchase more chips to play at the table - automatic re-buys should not be provided</p> <p>ii. written or graphical information should not encourage customers to try to win back their losses</p> <p>iii. customers who have chosen to exit a game should not be encouraged to continue playing by, for example, being offered a free game.</p> <p>b. This requirement is not intended to prevent operators from offering special features or well-known games such as blackjack that allow customers to increase their stake on the occurrence of specific events (e.g. split).</p> |
| <b>Assessment:</b>  | As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.   |

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| <b>Reference:</b>   | IPA / IPA 1 – Customer account information (4.1, 4.1:1, 4.1A, 4.1A.a, 4.1A.b, 4.1A.c, 4.1A.d, 4.1A.e, 4.1A.f) |
| <b>Requirement:</b>   |   |
| <p>All gambling except subscription lotteries</p> <p>To provide customers with facilities that enable them to review previous gambling and account transactions.</p> <p>Customers must have easy access to their account and gambling history. Where customers access operators' products or register via websites, it is acceptable to provide access to statements via these websites. For customers who do not access or register via websites, information is to be provided via the medium of access, or a copy must be sent via email, fax, or post.</p> <p>a. Account history should include credit and debit information such as deposits, withdrawals, movement of funds between products, payments off credit accounts, entry fee deductions, and bonus information, as appropriate.</p> <p>b. For betting, gambling history should include bets placed, and the results of bets, including winnings paid. For gaming (including bingo) full or summarised gaming information should be available, for example, £10 taken into game, £100 turned over, £3 taken away from game.</p> <p>c. Where customers are able to move funds between gambling products, account information and statements should clearly display movement of funds into and out of products.</p> <p>d. For telephone betting, where customers demonstrate that they also have access to websites – by registering online or using other online products – it is acceptable to provide access to statements via these websites, otherwise customers should be sent a regular copy of their statement via email, fax or post unless they elect not to receive this information. Customers should be sent a statement on request, even if they have opted out of receiving regular statements.</p> <p>e. For gaming, where detailed historic game information may not necessarily be directly available to customers, as a minimum, customers should have easy access to details of the last game played and summarised information for previous activities.</p> <p>f. For restricted display devices, where customers demonstrate that they also have access to websites – for example, by registering online or using other online products – it is acceptable to provide access to statements via these websites. Otherwise, if the information cannot practicably be provided on the device, customers should be sent a copy of the statement via email, fax or post.</p> |   |
| <b>Assessment:</b>  |   |
| As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.   |   |

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| <b>Reference:</b>  | IPA / IPA 2 – Displaying transactions – third party user-interfaces (4.2:1, 4.2:2, 4.2:3) |
| <b>Requirement:</b>  |   |
| <p>To inform customers who choose to use third party user-interfaces that they may not receive full information about their gambles. Customers must be informed that third party interface applications may not display full information about the customer's gambles.</p> <p>a. Information should be included in terms and conditions, rules or other general information about the gambling product that is made available to and/or sent out to customers.</p> |   |
| <b>Assessment:</b>   |   |
| As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.  |   |

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| <b>Reference:</b>   | IPA / IPA 3 – In-running betting (4.3, 4.3:1, 4.3A, 4.3A.a, 4.3A.b, 4.3A.c) |
| <b>Requirement:</b>   |   |
| <p>Betting and peer-to-peer betting</p> <p>To make the customer aware that they may not have the latest information available when betting on live events, and that they may be at a disadvantage to operators or other customers who have more up-to-date information.</p> <p>Information must be made available that explains that 'live' TV or other broadcasts are delayed and that others may have more up-to-date information. Main in-running betting pages must be designed to include this information where practicable.</p> <p>a. Brief information should be included on main in-running pages or screens, such as the in-running home page or screen. More detail should be provided in 'help' or 'how to' or other product pages or screens.</p> <p>b. For telephone betting the information should be included in the general betting or product information that is made available to and/or sent out to customers.</p> <p>c. Where a brief notice cannot be practicably included on the main pages or screens, the information should be provided on easily accessible 'help', 'how to' or other product pages or screens.</p> |   |
| <b>Assessment:</b>  |   |
| As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.   |   |

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| <b>Reference:</b>   | IPA / IPA 4 – Use of automated gambling software (4.4, 4.4:1, 4.4A, 4.4A.a, 4.4A.b, 4.4B, 4.4B.a, 4.4B.b) |
| <b>Requirement:</b>   |   |
| Peer-to-peer gambling   |   |
| To make customers in peer-to-peer(s) gambling aware that they may be gambling against a software program (designed to automatically participate in gambling within certain parameters), rather than another (human) participant. This software is sometimes referred to as a robot or bot.                  |   |
| Where operators use programs to participate in gambling on their behalf in peer-to-peer gambling, easily accessible information must be displayed, which clearly informs customers that the operator uses this kind of software.  |   |
| a. Peer-to-peer(s) gambling operators that use software to gamble on their behalf (for example, poker robots) should display a notice to customers on the home pages or screens and in the game description, 'help' or 'how to play/bet' pages or screens.  |   |
| b. As a minimum, restricted display devices should provide a link to further information on gambling pages/screens or in 'help', 'about' or 'how to bet/play' pages or screens.   |   |
| Where peer-to-peer(s) customers may be gambling against programs deployed by other customers to play on their behalf, information should be made available that describes that this is possible, and if it is against the operator's terms and conditions to use robots, how to report suspected robot use. |   |
| a. The warning and information about how to complain should be included in game descriptions, rules, terms and conditions, 'help', 'how to play' or other general product information pages.  |   |
| b. The warning should also inform customers that if they use a program to gamble on their behalf, other customers may be able to exploit it.  |   |
| <b>Assessment:</b>  |   |
| As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.   |   |

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| <b>Reference:</b>  | IPA / IPA 5 – Time-critical events (4.5, 4.5:1, 4.5A, 4.5A.a) |
| <b>Requirement:</b>  |   |
| Gaming (including bingo), betting on virtual events, and peer-to-peer betting  |   |
| To make the customer aware that they may be at a disadvantage due to technical characteristics, such as slower network connections or lower end user device performance, if they are participating in a time-critical form of gambling (where the customer's speed of interaction influences their chance of winning). |   |
| For time-critical events, the customer should be informed that they might be at a disadvantage because of technical issues such as slower network speeds, or slower end user device performance.   |   |
| a. Information should be included in game descriptions, rules, 'help' or 'how to play' pages.  |   |
| <b>Assessment:</b>   |   |
| As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.  |   |

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| <b>Reference:</b>  | IPA / IPA 6 – Interrupted gambling (4.6, 4.6A) |
| <b>Requirement:</b>  |  |
| Gaming (including bingo), betting on virtual events, and peer-to-peer betting  |  |
| Operators must make available information about their policies regarding service interruptions in various different circumstances. |  |
| <b>Assessment:</b>   |  |
| As a B2B provider Evolution Gaming do not manage customer accounts. This requirement is the responsibility of the operator.        |  |

## END OF REPORT