Tests marked with (*) are not covered by ENAC accreditation.

Evaluation Report for

SubTech Ltd.

5 Online Games

Manufacturer:	**SubTech Ltd.**
ATF Report Number:	**NET.PANDA-OL.1011.01.02**
Document Number:	**02**
Date:	**17 September 2021**
Number of Pages:	**16**

BMM Spain Testlabs s.l.u.

GENERAL INFORMATION

Client name & Address:	SubTech Ltd. Abacus Business Centre, Level 1 Birkirkara Bypass, Dun Karm Street Birkirkara BKR 9037 Malta
Client Reference Number:	Submission request letter dated: 17th August 2021
Testing dates:	Start date: 19th August 2021 End date: 8th September 2021
Product / Game Description:	5 Online Games
Test Category:	Category 0
Jurisdictions Recommended:	Netherlands
Technical Standard used for Evaluation:	▪ Netherlands Gambling Authority Online Gambling Assessment Scheme – (Remote gambling conformity assessment scheme) V1.4. May 2021 ▪ Decree of 26 January 2021, containing provisions for the implementation of the Remote Games of Chance Act (Remote Games of Chance Decree) #37 ▪ Regulations of the Minister for Legal Protection of 21 January 2021, no.3181156
Location where test was performed:	BMM Spain Testlabs, s.l.u. Edificio Vinson del Parque Empresarial Vallsolana Camí de Can Camps, 17-19 08174 Sant Cugat del Vallés - Barcelona (España)
Location where report was issued:	BMM Spain Testlabs, s.l.u. Edificio Vinson del Parque Empresarial Vallsolana Camí de Can Camps, 17-19 08174 Sant Cugat del Vallés - Barcelona (España)
Conclusion:	Pass
BMM Reference Number:	NET.PANDA-OL.1011
Method/Procedures used:	EURSAM-SPA-MO-04 v5.6
Consultant(s):	Ciprian Cojocarasu, Darien Velasquez, David Correa, Luca Borchini

1. SCOPE OF EVALUATION.

SubTech Ltd. requested BMM Spain Testlabs s.l.u., hereinafter referred to as BMM, to evaluate the products listed in section 2 for operation in the Netherlands Remote Gambling Market, accordingly with the Standards/ Regulations described below:

- Netherlands Gambling Authority Online Gambling Assessment Scheme – (Remote gambling conformity assessment scheme) V1.4. May 2021
- Decree of 26 January 2021, containing provisions for the implementation of the Remote Games of Chance Act (Remote Games of Chance Decree) #37
- Regulations of the Minister for Legal Protection of 21 January 2021, no.3181156

2. EVALUATION CHARACTERISTICS.

2.1. PLATFORM DESCRIPTION.

N/A, out of scope. Only game evaluation.

2.2. GAME DESCRIPTION.

GAME NAME	GAME VERSION	CHANNELS							APPROVAL DATE
		DESKTOP	FLASH	HTML5 DESKTOP	HTML5 MOBILE	NATIVE IOS	NATIVE ANDROID	MINI VERSION	
Book of Demi Gods II	1.0.0	-	-	X	X	-	-	-	14 September 2021
Book of Rebirth	1.3.0	-	-	X	X	-	-	-	14 September 2021
Egyptian Rebirth II	2.1.0	-	-	X	X	-	-	-	14 September 2021
Luxury Club	2.0.0	-	-	X	X	-	-	-	14 September 2021
Majestic King	1.3.3	-	-	X	X	-	-	-	14 September 2021

2.2.1. BOOK OF DEMI GODS II

Book of Demi Gods II is a 5x3 reel 100 lines video slot featuring Free Spins, Bonus Game and Expanding Symbol. All symbols pay from left to right starting with the leftmost reel.

Wild Symbol

Wild Symbol counts as any symbol.

The Wild Symbol is also a scatter symbol.

3 or more Wild symbols on the slot will trigger 10 free spins.

Bonus Game

Once free spins are triggered, the player will be presented with a wheel of all the symbols (except for scatter wild symbol).

Spin the wheel to determine which symbol will be the expanding symbol for the free spins round.

Free spins may re-trigger and award an additional 10 free spins.

Free Spins - Expanding Symbol

After the slot result has been determined, the expanding symbol will expand to form new paylines in addition to the existing paylines.

The symbol will expand only if the expansion results in a win.

Expanded symbols count separately from the original slot result.

Only during free spins.

Buy Feature

The Buy Feature allows you to purchase and immediately trigger a free spins round. By clicking the Buy Feature button, a window will be presented where bet can be modified, and this bet will play the free spins round, here the buy price will be set according to the bet. Clicking the buy button to pay the buy price will trigger the free spins round

2.2.2. BOOK OF REBIRTH

Book of Rebirth is a 5x3 reel 10 lines video slot featuring Free Spins, Bonus Game and Expanding Symbols Feature.

Wild Symbol

Wild Symbol counts as any symbol

The Wild Symbol is also a scatter symbol

3 or more Wild symbols on the slot will trigger 10 free spins.

Bonus Game

Once free spins are triggered, the player will be presented with a wheel of all the symbols (except for scatter wild symbol).

Spin the wheel to determine which symbol will be the expanding symbol for the free spins round.

Free spins may re-trigger and award an additional 10 free spins.

Free Spins - Expanding Symbol

After the slot result has been determined, the expanding symbol will expand to form new paylines in addition to the existing paylines.

The symbol will expand only if the expansion results in a win.

Expanded symbols count separately from the original slot result.

Only during free spins.

Buy Feature

The Buy Feature allows you to purchase and immediately trigger a free spins round. By clicking the Buy Feature button, a window will be presented where bet can be modified, and this bet will play the free spins round, here the buy price will be set according to the bet. Clicking the buy button to pay the buy price will trigger the free spins round.

2.2.3. EGYPTIAN REBIRTH II

Egyptian Rebirth II is a 5x3 reel 50 lines video slot featuring Stacked Wild free spins, Countdown Wilds, Mystery symbols and Bonus Game.

Wild Symbol

Wild Symbol counts as any symbol except free spins and Bonus.

Any 5 Wild Symbols on a winning line will pay Bet per Line x1000.

Mystery Symbol

After the reels have stopped, if there are mystery symbols on the slot, they will uncover and reveal 1 random symbol.

Except Bonus, Wild or free spins symbols.

Free Spins

3 or more scattered free spins symbols will trigger the free spin feature.

During free spins only, the wild symbol will expand on one of the reels and will stay there until the end of the free spins game.

When free spins mode is triggered, the player can choose 1 out of 5 options, in each option the stacked wild will be located on a different reel for the entire Free Spins game, and the amount of Free Spins will change accordingly.

Countdown Wild

After the reels have stopped, if there are any Countdown Wild symbols on the slot, the game will enter a re-spin mode.

During this mode, the Countdown Wild will stay for the next re-spin and its count will go down by 1.

Once there are no Countdown Wilds with a count bigger or equal to 1 on the slot, the re-spin mode will end.

During base game Countdown Wilds can appear only on reels 1,3 and 5.

During base game and re-spin modes.

Bonus Game

3 or more scattered bonus symbols will trigger the bonus game feature.

During bonus game, the player will be presented with a 3 level wheel of fortune and will have 3 attempts at spinning the wheel to win prizes like multipliers, extra spins or level up.

By getting a level up, the player will move to an inner circle of the bonus wheel, where the prizes are higher.

In addition, levelling up awards the player with an extra spin.

Once the players have used all spins, they will be awarded with the sum of wins that they have collected.

Buy Feature

The Buy Feature allows you to purchase and immediately trigger a free spins round. By clicking the Buy Feature button, a window will be presented where bet can be modified, and this bet will play the free spins round, here the buy price will be set according to the bet. Clicking the buy button to pay the buy price will trigger the free spins round.

2.2.4. LUXURY CLUB

Luxury Club is a 5x3 video slot game with 10 fixed lines where symbols pay left to right.

Bonus

Triggered when 3 or more Scatter Bonus symbols land on the reels. A 3-level wheel will be presented to the player and the player will have 3 attempts at spinning the wheel and win prizes like multipliers, extra spins or level up. When obtaining the level up, an additional spin is awarded and the player will move to the inner level of the wheel where the prizes are bigger. During base game only.

Free Spins

Obtained by landing 3 or more Scattered Free Spins on the reels. Five cards will be presented to the player and he/she will have to pick one, which will determine the amount of Free Spins to play. There is a card with an "ALL" that will grant the combined free spins of all 4 cards. Once the number of free spins is determined, 5 more cards will be presented to the player to determine which of the medium symbols will be the golden expanding symbol for the feature. An "ALL" card is also included, which will convert all the medium symbols to golden expanding symbols if picked.

Stacked Wilds

During the base game, when spinning the reels, Wild symbols can appear on the reels to increase the chances of winning.

Buy Feature

The Buy Feature allows you to purchase and immediately trigger a free spins round. By clicking the Buy Feature button, a window will be presented where bet can be modified, and this bet will play the free spins round, here the buy price will be set according to the bet. Clicking the buy button to pay the buy price will trigger the free spins round.

2.2.5. MAJESTIC KING

Majestic King is a 5x3 reel 25 lines video slot featuring 4 types of Free Spins, including Bonus Game, Extra Stacked Wilds Feature, Double Symbols Feature.

Wild Symbol

Wild Symbol counts as any symbol except Bonus

Any 5 Wild Symbols on a winning line will pay Bet per Line x200.

Extra Wilds

While the reels are spinning, wild symbols might appear on the reels and increase the chances of winning.

Only Double Symbols

While the reels are spinning, The Only Double Symbols might appear, and cause all symbols to appear in their double symbols form.

Bonus Game

3 or more scattered Bonus symbols will trigger the Bonus Game.

The game will start with 3 spins, Fill the meter by collecting scattered winning symbols.

Only during base game.

Free Spins

3 or more scattered Free Spins symbols will trigger Free Spins.

Spin the wheel to win the maximum amount of free spins and the symbol which will remain double throughout the whole free spins game.

Only during base game.

Buy Feature

The Buy Feature allows you to purchase and immediately trigger a free spins round. By clicking the Buy Feature button, a window will be presented where bet can be modified, and this bet will play the free spins round, here the buy price will be set according to the bet. Clicking the buy button to pay the buy price will trigger the free spins round.

2.3 MATHEMATICAL EVALUATION.

GAME NAME	GAME VARIATION / PAYTABLE ID	BMM CALCULATED RTP		CLIENT CALCULATED RTP		PUBLISHED % RTP
		% RTP MINIMUM	% RTP MAXIMUM	% RTP MINIMUM	% RTP MAXIMUM	
Book of Demi Gods II	Variation 89	89,25%	89,25%	88,94%	88,94%	88,94%
Book of Demi Gods II	Variation 92	91,77%	91,77%	91,71%	91,71%	91,71%
Book of Demi Gods II	Variation 94	94,10%	94,10%	93,96%	93,96%	93,96%
Book of Demi Gods II	Variation 1	96,14%	96,14%	95,98%	95,98%	96,14%

Notes: The difference between BMM and Client RTPs is due to simulation, and are within the expected ranges

GAME NAME	GAME VARIATION / PAYTABLE ID	BMM CALCULATED RTP		CLIENT CALCULATED RTP		PUBLISHED % RTP
		% RTP MINIMUM	% RTP MAXIMUM	% RTP MINIMUM	% RTP MAXIMUM	
Book of Rebirth	Variation 89	89,25%	89,25%	88,94%	88,94%	88,94%
Book of Rebirth	Variation 92	91,77%	91,77%	91,71%	91,71%	91,71%
Book of Rebirth	Variation 94	94,10%	94,10%	93,96%	93,96%	93,96%
Book of Rebirth	Variation 1	96,14%	96,14%	95,98%	95,98%	96,14%

Notes: The difference between BMM and Client RTPs is due to simulation, and are within the expected ranges

GAME NAME	GAME VARIATION / PAYTABLE ID	BMM CALCULATED RTP		CLIENT CALCULATED RTP		PUBLISHED % RTP
		% RTP MINIMUM	% RTP MAXIMUM	% RTP MINIMUM	% RTP MAXIMUM	
Egyptian Rebirth II	89 - 10FG Reel 1 Wild	89,03%	89,03%	89,03%	89,03%	88,97% - 89,10%
Egyptian Rebirth II	89 - 12FG Reel 2 Wild	89,07%	89,07%	89,05%	89,05%	
Egyptian Rebirth II	89 - 14FG Reel 3 Wild	89,17%	89,17%	89,09%	89,09%	
Egyptian Rebirth II	89 - 18FG Reel 4 Wild	89,07%	89,07%	88,97%	88,97%	
Egyptian Rebirth II	89 - 20FG Reel 5 Wild	89,12%	89,12%	89,10%	89,10%	
Egyptian Rebirth II	Variation 1	96,01%	96,31%	95,92%	96,19%	96,01% - 96,31%

Notes: The difference between BMM and Client RTPs is due to simulation, and are within the expected ranges

GAME NAME	GAME VARIATION / PAYTABLE ID	BMM CALCULATED RTP		CLIENT CALCULATED RTP		PUBLISHED % RTP
		% RTP MINIMUM	% RTP MAXIMUM	% RTP MINIMUM	% RTP MAXIMUM	
Luxury Club	Variation 89	88,95%	88,95%	88,93%	88,93%	88,93%
Luxury Club	Variation 92	91,85%	91,93%	91,78%	92,00%	92,00%
Luxury Club	Variation 94	93,11%	93,45%	93,10%	93,29%	93,29%
Luxury Club	Variation 1	95,56%	96,45%	96,44%	96,44%	96,44%

Notes: The difference between BMM and Client RTPs is due to simulation, and are within the expected ranges

GAME NAME	GAME VARIATION / PAYTABLE ID	BMM CALCULATED RTP		CLIENT CALCULATED RTP		PUBLISHED % RTP
		% RTP MINIMUM	% RTP MAXIMUM	% RTP MINIMUM	% RTP MAXIMUM	
Majestic King	Variation 89	88,63%	88,63%	88,69%	88,69%	88,69%
Majestic King	Variation 92	92,06%	92,06%	92,16%	92,16%	92,16%
Majestic King	Variation 94	93,95%	93,95%	94,04%	94,04%	94,04%
Majestic King	Variation 1	96,31%	96,31%	96,36%	96,36%	96,31%

Notes: The difference between BMM and Client RTPs is due to simulation, and are within the expected ranges

JACKPOT/S NAME	BMM CALCULATED RTP		CLIENT CALCULATED RTP		HIT RATE	BASE (START) VALUE	BET % CONTRIBUTION/S
	% RTP MINIMUM	% RTP MAXIMUM	% RTP MINIMUM	% RTP MAXIMUM			
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes: None of the games under evaluation have any jackpot feature.

bmm testlabs

2.4   EVALUATED SOFTWARE.

Product: See Section 2.2					
File Name	**Version**	**Location**	**Function**	**Digital Signature Type**	**Digital Signature**
RGS.Base.dll	2021-07-20.1	Server	Critical	SHA-1	1D81826D6037107BFBD5D7A62C65AF830C1CBF21
RGS.CertifiedConfigurations.dll	2021-07-20.1	Server	Critical	SHA-1	1BA166782FE0EB943585675BEA1FA91040D3D35E
RGS.CertifiedLogic.dll	2021-07-20.1	Server	Critical	SHA-1	526E5885D52D9D23943FC40428DA824DDE32177A
RGS.Helpers.dll	2021-07-20.1	Server	Critical	SHA-1	08F0F832A980B049B224EFF281F5B1CD040E00CB
RGS.Models.dll	2021-07-20.1	Server	Critical	SHA-1	4CF21AB1203CB07B8E545666A53037AB7E203BA0
RNGCryptoRandom.dll	2021-07-20.1	Server	Critical	SHA-1	BD86F5010FFF3015723964EDBEA2E5883B5215B6

3.   BMM EVALUATION PERFORMED.

BMM has tested and confirmed compliance of the products specified in Section 2 against the appropriate applicable technical requirements for the Netherlands Remote Gambling market. BMM performed the following tests to confirm compliance to the relevant regulatory specifications:

NETHERLANDS REGULATIONS & ONLINE GAMING	**PASS**	**FAIL**	**N/A**	**NOTES**
	EXTERNAL REF #			
DECREE OF 26 JANUARY 2021, CONTAINING PROVISIONS FOR THE IMPLEMENTATION OF THE REMOTE GAMES OF CHANCE ACT (REMOTE GAMES OF CHANCE DECREE) #37 & REGULATIONS OF THE MINISTER FOR LEGAL PROTECTION OF 21 JANUARY 2021, NO.3181156				
Gambling Technology				
Start of participation in a game: The license holder shall take appropriate technical and operational measures to ensure that participation in the game only commences if the player immediately prior to this takes an action that is expressly aimed at starting participation in that game.	☒ R3.7	☐	☐	
Casino games for players among themselves: When organizing casino games as referred to in Article 2.1, first paragraph, under b, of the Decree, the license holder will take appropriate technical and operational measures to ensure that a choice is made to influence the course of the game, if the player has sufficient opportunity immediately beforehand. commanded to perform an action aimed at introducing one's own choice.	☒ R3.9.1	☐	☐	

NETHERLANDS REGULATIONS & ONLINE GAMING	PASS	FAIL	N/A	NOTES
	EXTERNAL REF #			
DECREE OF 26 JANUARY 2021, CONTAINING PROVISIONS FOR THE IMPLEMENTATION OF THE REMOTE GAMES OF CHANCE ACT (REMOTE GAMES OF CHANCE DECREE) #37 & REGULATIONS OF THE MINISTER FOR LEGAL PROTECTION OF 21 JANUARY 2021, NO.3181156				
The license holder shall take appropriate technical and operational measures to ensure that a choice to influence the course of the game is only introduced in the absence of an action by the player as referred to in the first paragraph if:	R3.9.2			
this choice is reasonably least likely to disadvantage the player as compared to other choices that may be introduced; and	☐	☐	☒	N/A, the evaluated games do not have such functionallities.
	R3.9.2.a			
this choice does not give the player an unreasonable advantage over other players.	☐	☐	☒	N/A, the evaluated games do not have such functionallities.
	R3.9.2.b			

NETHERLANDS REGULATIONS & ONLINE GAMING	PASS	FAIL	N/A	NOTES
	REF.			
DECREE OF 26 JANUARY 2021, CONTAINING PROVISIONS FOR THE IMPLEMENTATION OF THE REMOTE GAMES OF CHANCE ACT (REMOTE GAMES OF CHANCE DECREE) #37 & REGULATIONS OF THE MINISTER FOR LEGAL PROTECTION OF 21 JANUARY 2021, NO.3181156				
PAYMENT TRANSACTIONS	3.2.1			
The gambling system shall ensure that rules and instructions (including restrictions for games and how the customer plays) are readily available from all game pages related to the game.	☒	☐	☐	
	B4.31.3:1			
The gambling system shall ensure that the name of the game is shown on all pages related to the game. Guidance: The game name may be visible in the title bar of the window or the tab in which the game is running	☒	☐	☐	
	B4.31.3:2			

The gambling system shall ensure that the balance of the gambling account is shown or readily accessible from all game pages.	☒	☐	☐	
	B4.31.3:3			
The gambling system shall show the customer the amount of the stake he or she is placing, including the game unit stake and the total stake.	☒	☐	☐	
	B4.31.3:4			
Quality Management System	**3.2.3**			
The gambling system shall allow the customer to complete any incomplete games. Guidance: Incomplete games include: (a) loss of communication, (b) system reboots, (c) games being deactivated/activated, (d) customer rebooting, (e) abnormal shutdown of client, etc. After reestablishment, the systems shall display the unfinished games to the customer. Guidance: A situation where a customer is dropped from a peer to peer game due to reasons not attributed the gambling system is not considered an incomplete game for the customer in question.	☒	☐	☐	
	R3.3: 1			
The gambling system shall ensure that all incomplete games are accounted for, and that the customer knows the status of these games and his or her stake. Guidance: Stakes that are locked in incomplete games that can be completed shall be held in a separate account until the game is completed. Incomplete games shall be shown separately in the customer's gambling account.	☒	☐	☐	
	R3.3: 2			
The rules shall address how interruptions of ongoing games are handled.	☒	☐	☐	
	R3.3: 3			
The gambling system shall clearly display the customer's possible stake, actual stake and, if relevant, a conversion from currency to bet denomination (in a manner that makes it easy to infer the rate of exchange).	☒	☐	☐	
	R3.5: 1			
The gambling system shall clearly display the bet denomination or currency of the game.	☒	☐	☐	
	R3.5: 2			

The gambling system shall ensure that a customer cannot start a new game until the ongoing game is completed and all logs and balances have been updated. Guidance: This does not prevent a customer from playing several different games at the same time.	☒	☐	☐	
	R3.8			
Games without stakes (free games, games for fun, trial games etc.) shall present the chance of winning in a correct and balanced way so as not to create an impression that the chance of winning is bigger than it actually is in games with stakes.	☒	☐	☐	
	R3.2.1: 2			
Functionality with an element of chance but not used for generating results shall be based on a certified Random Number Generator (RNG) and related functionality (seeding, mapping, shuffling, etc.). Guidance: e.g. this could be a players assignment of seat at the poker table in a poker tournament or the generation of bingo cards for online bingo	☐	☐	☒	N/A, evaluated games do not have this feature.
	R3.2.1: 14			
Mapping and scaling of the RNG for symbols or events shall ensure that the output can be approved through the corresponding randomness tests of the RNG they were taken from. Guidance: The scaled sequence of numbers shall pass the same statistical tests that apply to the sequence of numbers produced by the RNG; scaled algorithms are not permitted to lead to bias or result in the creation of patterns.	☒	☐	☐	
	R3.2.1: 23			
The licence holder shall be able to verify that the results of the RNG are the same as those found in the gambling system after the event.	☐	☐	☒	N/A, only games evaluation.
	R3.2.1: 24			
If the rules of the game require a sequence or mapping of units or events to be set up in advance (e.g. location of hidden objects within a labyrinth), it is not permitted to assign a new sequence or new mapping to the units or events unless this is stated in the rules.	☐	☐	☒	N/A, the evaluated games do not use a sequence or mapping of units or events to be set up in advance.
	R3.2.1: 25			
Unless it is stated in the game rules, the events based on randomness in the game shall be	☒	☐	☐	
	R3.2.1: 26			

independent of (not related to) other events in the game or events in previous games.			
Random outcomes that decide games shall not be affected or controlled by anything else than number values produced in an approved manner by the verified RNG combined with the rules of the game. Guidance: This does not exclude permissibility of games which temporarily change character while they are ongoing or jackpots decided by anything else than simple game results.	☒ ☐ ☐ R3.2.1: 27		
RNG output which is mapped and scaled for a symbol or an event shall be applied immediately and in accordance with the game rules. Guidance: this does not prevent games which temporarily change character while ongoing from being played in accordance with the game rules of these games.	☒ ☐ ☐ R3.2.1: 30		
Games shall be independent of the characteristics of the customer's equipment and/or communication channel.	☒ ☐ ☐ R3.2.1: 31		
Games shall give customers fair expectations of their chances of winning by correctly presenting all outcomes and/or events on which the games are based. Guidance: concepts such as "near-miss" are not regarded to be fair in this connection.	☒ ☐ ☐ R3.2.1: 32		
Games shall give a fair impression of whether a customer is able to affect the outcome. Guidance: Games which give the customers the impression that they have control over the out-come of the game when they do not (i.e. the result is completely random) are not permitted.	☒ ☐ ☐ R3.2.1: 33		
The gambling system shall ensure that all games which are being presented as being based on random outcomes actually have the same likely	☒ ☐ ☐ R3.2.1: 34		

chance of producing a given combination each time the game is played. Guidance: the return to player shall not be manipulated by the system or by manual interference to maintain a constant return to player to the player. Guidance: the games are not allowed to adjust to the behaviour of the player.				
Games which involve the simulation of a physical object (dice, roulette wheels, etc.) shall provide true and fair outcomes in accordance with expectations to this physical object. Guidance: if a game is presented as a direct or indirect simulation of a physical object, the simulation shall be identical with the expected behaviour of the physical object.	☐	☐	☒	N/A, the evaluated games do not involve any simulation of physical objects.
	R3.2.1: 35			
The gambling system shall ensure that the return to player corresponds to what the customer has been led to expect, irrespective of the game unit stake.	☒	☐	☐	
	R3.2.1: 37			
All games shall have associated rules and instructions covering all aspects of the game.	☒	☐	☐	
	R3.4.2			
The game rules (see 4.3.1.1 above) shall be true and fair and unambiguous.	☒	☐	☐	
	B4.34.1, B4.34.2, B4.38.1: 1			
The game rules shall be available to the customer through the same medium and on the same unit as that used for the actual game.	☒	☐	☐	
	B4.34.1, B4.34.2, B4.38.1: 2			
The game rules shall not change during the actual game.	☒	☐	☐	
	R3.4, B4.34			

Requirement	☒	☐	☐	Comments
Games shall always be arranged in accordance with the current game rules.	☒	☐	☐	
	B4.34.1, B4.34.2, B4.38.1: 4			
Written instructions shall be in Dutch and be both grammatically and syntactically correct. *Guidance:* This does not prevent translation of written instructions into other languages. *Guidance:* Where in Danish legislation it is stipulated that the Danish language must be used, the betting and gambling activities to be assessed for compliance with Dutch legislation must be in Dutch.	☒	☐	☐	
	B4.34.1, B4.34.2, B4.38.1: 5			
The base version language is Dutch (if several languages are used). *Guidance*: Where in Danish legislation it is stipulated that the Danish language must be used, the betting and gambling activities to be assessed for compliance with Dutch legislation must be in Dutch.	☒	☐	☐	
	B4.34.1, B4.34.2, B4.38.1: 6			
All playing information shall be given to the customer in the language chosen by the customer. Game rules and instructions shall be the same in all language versions.	☐	☐	☒	N/A, only games evaluation
	B4.34.1, B4.34.2, B4.38.1: 7			
Game rules and instructions shall be available without it being necessary to place a stake.	☒	☐	☐	
	B4.34.1, B4.34.2, B4.38.1: 8			
Game rules and instructions shall be available during the entire game. Guidance: Playing instructions shall be visible and readily accessible in all situations. *Guidance*: When a game temporarily changes character when it is played, the game rules and instructions shall be changed correspondingly.	☒	☐	☐	
	B4.34.1, B4.34.2, B4.38.1: 9			
The gambling system shall inform the customer of the theoretical return to player when using an optimal game strategy and it shall be clear which game options are not parts of an optimal game strategy. The information shall be available in the game rules for each game. *Guidance*: When a progressive prize is offered, it shall be implemented in a manner ensuring, that the theoretical minimum return to player is correctly displayed to the customer.	☒	☐	☐	
	B4.34.1, B4.34.2, B4.38.1: 10			

ADDICTION PREVENTION				
The gambling system shall ensure that rules and instructions (including restrictions for games and how the customer plays) are easily available from all game pages related to the game.	☒	☐	☐	
	9: 1			
The gambling system shall ensure that the name of the game is shown on all pages related to the game. Guidance: the game name may be visible in the title bar of the window or the tab in which the game is running.	☒	☐	☐	
	9: 2			

4. ADDITIONAL INFORMATION/OBSERVATIONS.

4.1 The RNG was previously evaluated in the report with reference "e217136SPNNLD (*)" issued on 7th September 2021 by eGaming Compliance Services Limited ('eCOGRA').

4.2 Tests marked with (*) are not covered by ENAC accreditation.

4.3 This report is a modification of the previously issued BMM test report NET.PANDA-OL.1011.01.01 dated 14th September 2021. The reason(s) for the modification are as follows:

    a) The client's name has been changed from "Panda Bluemoon Ltd." to "SubTech Ltd." throughout all instances of this report, due to a typographical error on our end.

    b) In page 2, the client's address has been changed from "Metzada 7, Bnei Brak, Israel" to "Abacus Business Centre, Level 1 Birkirkara, Bypass Dun Karm Street, Birkirkara BKR 9037 Malta" due to a typographical error on our end.

The applicant is responsible to annul, eliminate, and/or to replace the previous evaluation report with this current evaluation report, and to communicate it to whom it is pertinent.

5. CONCLUSION.

According to the test results[1,2], BMM Spain Testlabs s.l.u. confirms that the item submitted for testing is compliant with all the relevant Regulations listed in section "1" of this report.

Yours sincerely,

Patricia García

Director of iGaming Services Delivery EURSAM

[1] The results included in this document refer exclusively to the sample tested, such as it is described in the corresponding section.

[2] BMM Spain Testlabs s.l.u. will not be held responsible for the results extracted from third party test reports, that are referred to in this document.