



Certification Report.	Pragmatic Play Conformity Assessment Report – Reels Room
Report Identification	PPL-NL-221209-02-GC-R1
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Jurisdiction	Netherlands Gambling Authority (Ksa: Kansspelautoriteit) The Netherlands
Technical Standard used for testing	Remote Gambling Gaming System Assessment Scheme (Conformity assessment scheme) Version 2.0

**Gaming Associates**

# 1 Notations

## 1.1 Confidentiality

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This document, its themes, and ideas are strictly confidential and may not be used in any manner other than its expressed purpose, without the written permission of the author. The documents are for the intended client named in this report, also referred to as “the client” or “client”, and the applicable gaming jurisdiction mentioned in this document.

The documents are copyright.

## 1.2 Disclaimer

**ga** has reported on what was discovered throughout the assessment period of the client’s game(s) related to the technical scope of testing as per applicable jurisdictional requirements. Results are based on the client’s submission of information material, access to the testing environment and applicable testing is performed within a finite period.

Inherently there are limitations in performing compliance testing within a laboratory environment and accordingly **ga** has undertaken its best endeavours to ensure a thorough assessment is performed and conclusion stated.

## 2 Administration

### 2.1 Contents

<b>1</b>	<b>Notations .....</b>	<b>2</b>
1.1	Confidentiality .....	2
1.2	Disclaimer.....	2
<b>2</b>	<b>Administration .....</b>	<b>3</b>
2.1	Contents.....	3
2.2	Version.....	3
<b>3</b>	<b>Executive summary .....</b>	<b>4</b>
3.1	Introduction .....	4
3.2	Scope of evaluation.....	4
3.3	Assessment plan.....	4
3.4	Test summary .....	4
3.5	Conclusions and recommendations.....	4
<b>4</b>	<b>Test Results .....</b>	<b>5</b>
4.1	Assessment framework.....	5
4.2	Return to Player.....	16
<b>5</b>	<b>References.....</b>	<b>17</b>
<b>Annex A : Hashes of Critical Components .....</b>		<b>18</b>
<b>Annex B : Game Assessment Plan .....</b>		<b>19</b>
<b>End of document.....</b>		<b>21</b>

### 2.2 Version

Version	Description	Date
V0.1	Initial draft – MARB	2022-12-05
V0.2	Reviewed & Updated – WKAS	2022-12-06
V0.3	QA- UVAS	2022-12-07
V1.0	Issued to Pragmatic Play	2022-12-09

### 3 Executive summary

#### 3.1 Introduction

Pragmatic Play Ltd (Pragmatic Play) has requested Gaming Associates (**ga**) to test their game, Reels Room, against requirements of Netherlands Gambling Authority (Ksa: Kansspelautoriteit) Remote Gambling Gaming System Assessment Scheme (Conformity assessment scheme), Version 2.0.

This report presents the results of testing performed by **ga** for the Reels Room game against Ksa requirements. Hashes of game are listed in Annex A : of this report.

#### 3.2 Scope of evaluation

Pragmatic Play's game, Reels Room, has been tested against the following requirements of Ksa conformity assessment scheme:

##### Assessment framework

- 3.2 Payment transactions
- 3.9 Gambling technology
- 3.10 Addiction prevention

#### 3.3 Assessment plan

Game assessment plan including information such as assessment methods used, assessment activities performed, and findings is provided in Annex B : Game Assessment Plan.

#### 3.4 Test summary

Below is a summary of the information about the game.

Game Name	Game Type	Channels (game clients)	Jackpot	Game version	Return to Player (RTP%)
Reels Room	Bingo Game	Desktop and Mobile	NO	N/A	70.00%

#### 3.5 Conclusions and recommendations

Pragmatic Play's game, Reels Room, complies with the requirements of Ksa Remote Gambling Gaming System Assessment Scheme (Conformity assessment scheme).

**ga** recommends Reels Room to be approved for use in Ksa approved platform production systems.

## 4 Test Results

This section summarises the results of the tests performed on Pragmatic Play's game, Reels Room. The tables in the following sub-sections provide the compliance status of the game against Ksa requirements as per scope of testing. Different values used in the compliance status column are described as follows:

**Compliant:** The game complies with the requirement.

**Pending:** The requirement could not be verified at the time of game evaluation.

**Acknowledged:** The requirement is only a statement or information.

**N/A:** The requirement is not applicable to the game.

**Out of scope:** The requirement cannot be evaluated at this stage due to the current scope of testing or limitation of test environment.

### 4.1 Assessment framework

Ksa Requirement	Compliance Status
<b>3.2 Payment transactions</b>	
<b>3 - Section number Decree: B4.25.1</b> <b>ID NL: KS.02.01_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, confirm that all payment transactions between the licensee and the player are carried out exclusively through the gambling account.	N/A
<b>4 - Section number Decree: B4.25.2</b> <b>ID NL: KS.02.02_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, confirm that the licensee exclusively allows the use of payment instruments for payment transactions that:	N/A
a. have been issued by a credit institution registered in a Member State and which holds a licence as referred to in Article 8 of Directive 2013/36/EU or by a payment service provider registered in a Member State with a licence as referred to in Article 11 of Directive (EU) 2015/2366;	N/A
b. can be clearly traced back to the player.	N/A
In terms of design and implementation, confirm that the player cannot credit his gambling account with money from a different payment account until his gambling account has first been credited, provided that the payment instrument in question. In terms of design and implementation, confirm that the player cannot credit his gambling account with money from a different payment account until his gambling account has first been credited, provided that the payment instrument in question was issued by a licensed credit institution or payment service provider (which is to say that players cannot use anonymous payment instruments).	Acknowledged
Note: the assessment standards under points a, and b in this standard also apply to the other payment account.	
<b>Explanatory note:</b> 'The gambling account must be linked to a payment account at a bank or with a payment service provider (the current account). This follows from the definition of the gambling account in Section 1.1. The identity of the account holder will have been confirmed and verified by the relevant bank or payment service provider when that account was opened. The payment of the current account into the gambling account (Section 4.27(1)) confirms that the player is also the holder of the current account. In principle, the money to be waged when placing bets or gambling in licensed gambling activities must come from that current account, onto which the winnings that are obtained will similarly be paid so that they can be made available to the player. Following the initial credit of the gambling account, the player may also credit the gambling account with money from another payment account. In doing so, the player may use any payment instrument accepted by the licensee, provided that it has been issued by a licensed credit institution or payment service provider and is not an anonymous payment instrument (subsection two). The requirements under section 1a and b of the standard must be observed in relation to credit from another payment account under the second section of the standard. The player should be able to be traced back to the accounts for which they have identified themselves with the relevant payment institution.	Acknowledged

Ksa Requirement	Compliance Status
<b>5 - Section number Decree: B4.27.1</b> <b>ID NL: KS.02.03_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, confirm that, except for corrections, the licensee will only credit a player's gambling account with money that:	
a. came from said player's current account or from a different payment account with a credit institution or payment service provider and can be clearly and unambiguously traced back to the player in question; and	N/A
b. resulted from winnings; or	N/A
c. resulted from free play credits (bonus) granted to the player in question.	N/A
<b>6 - Section number Decree: B4.27.2</b> <b>ID NL: KS.02.04_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, confirm that the licensee does not credit the player's gambling account with money if:	
a. this should exceed one or more maximum limits set by the player pursuant to Section 4.14;	N/A
b. the possibility of placing bets or gambling has been suspended	N/A
<b>7 - Section number Decree: B4.28.2</b> <b>ID NL: KS.02.05_2.0</b>	
<b>Assessment standard</b> Confirm that the design does not allow the licensee to enable a player to place bets or gamble if the balance (including any gambling credit) on his gambling account does not allow them to do so. Rule out the fact that players can end up with a negative balance on their gambling account.	Compliant
<b>8 - Section number Decree: B4.29.2</b> <b>ID NL: KS.02.06_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, confirm that the licensee will only debit a player's gambling account in favour of the player's current account after that gambling account has been credited with money from that current account, with the payment account having to meet the relevant criteria (nonanonymous). If the player switches current (bank) accounts, the foregoing shall likewise apply (in Section 4.25 of the Order in Council).	N/A
<b>9 - Section number Decree: B4.29.3-4</b> <b>ID NL: KS.02.07_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, confirm that the licensee will only debit the gambling account in favour of the current account, unless the reliable, responsible and verifiable organisation of the licensed betting and gambling activities resists such a transaction:	
a. at the player's own request;	N/A
b. in the event that the balance on the player's gambling account exceeds the maximum specified by the player on their profile;	N/A
c. in the event that the player's registration is terminated at their request in accordance with Section 4.17, under a.	N/A
Confirm that the aforementioned procedures are not carried out as long as a player is suspended from placing bets or gambling on the platform because the licensee has reason to believe that the player does not meet or has stopped meeting the conditions for registration.	N/A
<b>10 - Regulations number Decree: R4.11</b> <b>ID NL: KS.02.08_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, confirm that the licensee systematically records the following information as part of its registration process with regard to each transaction carried out to or from a gambling account:	
a. the identity of the player whose gambling account is debited or credited;	N/A
b. the date and time of the transaction;	N/A
c. the amount debited or credited by the transaction;	N/A

Ksa Requirement	Compliance Status
d. the nature of the transaction; this must take place on the basis of clearly identifiable, unique signifiers such as deposit, payment, winnings, bonus credit and other sufficiently recognisable signifiers, such that these signifiers allow others to reconstruct the course of a game;	N/A
e. the nature of the payment instrument used for the transaction;	N/A
f. the account number or another unique signifier for the payment account that has been debited or credited by the transaction;	N/A
g. the account number or another unique signifier for the payment instrument used for the transaction.	N/A
In terms of design and implementation, establish that the gaming system provides for the generation of reports of the transaction to or from a gambling account.	N/A
Confirm that the licensee records the following information in the Controledatabank for each gambling account where applicable:	N/A
a. any amount that is not debited in favour of the player's current account, given that the reliable, responsible and verifiable organisation of the licensed betting and gambling activities has resisted such a transaction;	N/A
b. the date and time of any request to credit the gambling account that the licensee has rejected due to the use of a payment instrument that is not compliant (with Section 4.27(1), heading and under a, of the Decree).	N/A
<b>11 - Section number Decree: B4.31.1</b> <b>ID NL: KS.02.09_2.0</b>	
<b>Assessment standard</b> Confirm that the design ensures that the licensee provides the player with access to general information regarding the way in which and the conditions under which payment transactions with the player take place on the publicly accessible area of the betting and gambling interface and on the player interface.	N/A
<b>12 - Section number Decree: B4.31.2</b> <b>ID NL: KS.02.10_2.0</b>	
<b>Assessment standard</b> Confirm that the design ensures that the licensee provides the player with access to the necessary information relating to their gambling account and the changes to the gambling account on each page or screen of the player interface. This information shall in any case include:	
a. the current balance of the gambling account;	Compliant
b. the opening balance of the gambling account at the most recent login;	N/A
c. the total stake since the most recent login;	Compliant
d. the total profits and the total losses since the most recent login, and	N/A
e. an overview of all transactions on the gambling account for a period of at least the last 90 days	N/A
<b>13 - Section number Decree: B4.31.4</b> <b>ID NL: KS.02.11_2.0</b>	
<b>Assessment standard</b> In terms of design, confirm that the licensee will, at the player's request, provide them with an overview of the transactions on the gambling account covering a period of at least the last 12 months.	N/A
<b>3.9 Gambling technology</b>	
<b>54 - Regulations number Decree: R3.11</b> <b>ID NL: KS.09.01_2.0</b>	
<b>Assessment standard</b> In terms of design, confirm that the licensee identifies, analyses and evaluates potential integrity risks and always includes the following issues in its considerations:	
a. the relevant characteristics of players;	N/A
b. the payment transactions and the payment instruments authorised by the licensee and used by players;	N/A
c. the geographic location of players;	N/A
d. the behaviour of players, including at least their gambling behaviour.	N/A

Ksa Requirement	Compliance Status
<b>Explanatory note</b> The geographic location from which players sign in may pose an integrity risk. Such risks may include players who log into their Dutch gambling account from abroad, in particular if this takes place from countries that are subject to sanctions. Another example of an integrity risk is if attempts are made to log in simultaneously or in short succession from various locations or attempts to log into the same gambling account, particularly if there are large physical distances between these locations. This may be a sign that someone is attempting to log in under a different name or that an attempt is being made to gain unauthorised access to a gambling account. Where the likelihood of collusion, as referred to in the foregoing, is greater, if players are registered at the same address, this will also be the case if multiple players are placing bets or gambling in the same game of chance from the same location.	Acknowledged
<b>55 - Regulations number Decree: R3.2.2</b> <b>ID NL: KS.09.02_2.0</b>	
<b>Assessment standard</b> In terms of design, implementation and operation, establish that the licence holder has ensured that the gaming system is configured in such a way that players will not be able to bet or gamble against themselves. To this end, the gaming system must, inter alia, prevent multiple players from using the same device at once. Licence holders are not permitted to allow players to create more than one gambling account.	N/A
<b>56 - Regulations number Decree: R3.4.1</b> <b>ID NL: KS.09.03_2.0</b>	
<b>Assessment standard</b> In terms of design, establish that the licence holder only uses names for the games on offer that match the types of game actually being played (poker, roulette, betting, etc.)	Compliant
<b>57 - Regulations number Decree: R3.6</b> <b>ID NL: KS.09.04_2.0</b>	
<b>Assessment standard</b> In terms of design, establish that the licence holder will only award non-cash prizes to people who have actually won them and that the licence holder will not do so until it has reliably confirmed and verified the player's identity and current account as specified in the foregoing standards.	N/A
Non-cash prizes must also be documented in such a way that they can be traced back to the player's person.	N/A
<b>58 - Regulations number Decree: R3.7</b> <b>ID NL: KS.09.05_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that devices cannot automatically begin taking part in betting or gambling activities without the input of the player.	Compliant
In terms of design and implementation, establish that a player will not begin participating in a game until they press a real or virtual button to confirm their stake.	Compliant
In terms of design and implementation, confirm that games against the licensee do not include any form of automatic stakes.	N/A
In terms of design and implementation, establish that the so-called auto-play functionality can only be used after the start of a game where another player is played at the same time.	N/A

Ksa Requirement	Compliance Status
<p><b>Explanatory notes on stakes and auto play:</b></p> <p>The stake in a game can also take the form of stakes that cannot be cashed in, such as “free spins”, “bonus points”, “bonus buys” or similar.</p> <p>The key principle in this case is that the input of a choice is the direct result of an action taken by the player. If a player does not make use of the facility made available, the gaming system can enter and record a choice – in accordance with the applicable rules of the game. In doing so, it will remain necessary for the player to place the stake themselves. As such, auto-play for the placement of stakes is not permitted.</p> <p>Different types of autoplay exist. Some casino games feature a (traditional) autoplay button, which automatically places stakes for as long as sufficient gaming credit remains. The autoplay session is ended by pressing this button once more. In another variant, players are able to specify the number of consecutive games for which they wish to place automatic stakes, provided there is sufficient gaming credit. Other casino games use an indirect route, with players not indicating how much of their gaming credit they wish to use automatically and instead buying a number of “free spins” or “bonus spins”. The spins are then automatically played in succession during a session that cannot be stopped early. The latter can also be referred to as “buy”, “buy spins” and “buy feature”. Holding down buttons on the keyboard in order to continue playing can also be regarded as a type of autoplay. Each of these cases enable a player to play consecutive games, without having to carry out any affirmative action in between in order to start the next game. Such types of autoplay are not permitted in casino games against the licensee.</p> <p>It may be the case that, when participating in licensed gambling activities the player does not enter or cannot enter a choice to influence the course of the game, for example, if the player has taken a break. This is why casino games in which players play against each other, such as poker, have an auto-play functionality, which enters the choice required to further the course of play.</p>	Acknowledged
<p><b>59 - Regulations number Decree: R3.9</b> <b>ID NL: KS.09.06_2.0</b></p>	
<p><b>Assessment standard</b></p> <p>In terms of design, establish that the auto-play function operates in accordance with the rules of the game, as communicated to the player. At the very least, establish that the fairness of the function and the timeliness of choices are addressed.</p>	N/A
<p>In terms of design, establish that a player cannot simply stake money on something by using the auto-play function, unless this is necessary for the progress of the game, in accordance with rules that must be easily understood by the players (e.g. blinds in a game of poker).</p>	N/A
<p><b>Explanatory note on auto play:</b></p> <p>The key principle in this case is that the input of a choice is the direct result of an action taken by the player. If a player does not make use of the facility made available, the gaming system can enter and record a choice – in accordance with the applicable rules of the game. In this context, it must still be necessary for the player to perform an action in order to make the bet. Auto-play for betting purposes is therefore not permitted.</p> <p>It may be the case that, when participating in licensed gambling activities, the player does not enter or cannot enter a choice to influence the course of the game, for example, if the player has taken a break. This is why casino games in which players play against each other, such as poker, have an auto-play functionality that enters the choice required to further the progress of the game.</p>	Acknowledged
<p><b>60 - Regulations number Decree: R3.9a</b> <b>ID NL: KS.09.07_2.0</b></p>	N/A
<p><b>Assessment standard</b></p> <p>In terms of design and implementation, establish that the gaming system has been set up in such a way that fair play is guaranteed at all times in live casino games, by way of the following technical requirements:</p>	
<p>a. The player is able to take part in those casino games via a direct video link. b. The direct video link and, where applicable, other communication connections and means of communication:</p> <ul style="list-style-type: none"> <li>i. have been sufficiently protected against malfunctions;</li> <li>ii. are protected against unlawful access, unauthorised use and manipulation;</li> </ul> <p>c. the progress of the live casino games and the gambling behaviour of players is analysed and recorded on the basis of video surveillance and video reporting;</p>	
<p>d. the analysis and recording, as referred to under c., shall in any case be aimed at identifying and countering fraud and abuse, as well as risks of gambling addiction;</p>	
<p>e. Only personnel who have the requisite qualifications and have received training either internally or externally or have attended a training course shall be used to organise the live casino games.</p>	

Ksa Requirement	Compliance Status
<b>61 - Regulations number Decree: R3.3</b> <b>ID NL: KS.09.08_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that the gaming system allows the player to finish a game interrupted by malfunctions. In terms of design and implementation, establish that the gaming system provides information to the player about the status of a game interrupted by malfunctions.	Compliant
<b>62 - Regulations number Decree: R3.5</b> <b>ID NL: KS.09.09_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that, before play commences, the gaming system provides the player with information about the possible bets and the bets selected by the player.	Compliant
In terms of design and implementation, establish that the player provides the value of their stake in money (a currency) before the game starts.	Compliant
<b>Explanatory note:</b> When organising remote gambling, the licence holder is free to indicate players' stakes in units other than currency, such as a representation in points or various types of chips. The licence holder shall inform the player about the use of units other than currency prior to their participation in the gambling activities. The licence holder shall also provide the player with a means by which it is clear to the player during play what amount of money they are betting or what amount of money is required as a stake. This could include a calculation tool. This makes it easier for the player to monitor their own financial or other limits, adjust their playing behaviour accordingly or even decide not to participate any longer.	Acknowledged
<b>63 - Remote Gambling Decree and Regulations: B4.2.3 and R3.2.1</b> <b>ID NL: KS.09.10_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that, with the exception of the actual betting and the actual payment of the prizes, the practice games are the same as the gambling activities offered by the licence holder.	Compliant
<b>64 - Regulations number Decree: R3.2a.1</b> <b>ID NL: KS.09.11_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that the Random Number Generator applied is suitable for the form of gambling for which the Random Number Generator is used.	Compliant
<b>Explanatory note:</b> The Random Number Generator must be suitable to be used for the random parts of the gambling activities. The results of the random aspects of the gambling activities are directly related to the draw by means of a Random Number Generator.	
<b>65 - Regulations number Decree: R3.2a.3</b> <b>ID NL: KS.09.12_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that, for casino games, each Random Number Generator, with a data set of at least 1,000,000 outcomes, successfully passes one of the below tests:	Compliant
• the DIEHARD Test (Marsaglia);	
• the NIST (National Institute of Standards and Technology) or TESTU01.	
For mechanical random number generators such as roulette kettles, it is possible to limit the dataset to a minimum of 1000 times the possible outcomes. Explanatory note: When using a physical die that has 6 possible outcomes, the minimum dataset is $6 * 1000 = 6000$ .	
<b>66 - Regulations number Decree: R3.2.1</b> <b>ID NL: KS.09.13_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that each Random Number Generator is equipped with a suitable method of seeding and re-seeding so that predictability of results is avoided.	Compliant
<b>67 - Regulations number Decree: R3.2.1</b> <b>ID NL: KS.09.14_2.0</b>	

Ksa Requirement	Compliance Status
<b>Assessment standard</b> In terms of design and implementation, establish that, except for the randomness of other players, the outcome of all chance parts of the gambling activities are based on the Random Number Generator. <b>Exception:</b> when using a randomness mechanism without replacement, the outcome of the random parts can be predictable to a certain extent. <b>Examples:</b> a second draw from a real or virtual pile of cards without the first card drawn being put back or a draw of virtual bingo without the first draw being replaced.	Compliant
<b>68 - Regulations number Decree: R3.2.1</b> <b>ID NL: KS.09.15_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that each outcome of the Random Number Generator, and the result it has led to in the gambling, is recorded.	Compliant
<b>69 - Regulations number Decree: R3.2.1</b> <b>ID NL: KS.09.16_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that the outcome of any game is determined solely by chance and the choice or choices made by the player within the framework of the game.	Compliant
<b>70 - Regulations number Decree: R3.2.1</b> <b>ID NL: KS.09.17_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that the gambling can function in the same way, independently of the means used by the players.	Compliant
<b>71 - Regulations number Decree: R3.2.1</b> <b>ID NL: KS.09.18_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that the odds of winning or losing expected by the player correspond to the odds generated and presented by the gambling activities.	Compliant
<b>Explanatory note:</b> Constructions such as 'near miss', or similar constructions whereby situations of 'you almost won' are deliberately presented, are not permitted. For example, gambling activities in which a physical object is simulated (e.g. dice, roulette wheels, fruit machines) will have to provide fair results that are in line with expectations with regard to a physical object.	Acknowledged
<b>72 - Regulations number Decree: R3.2.1</b> <b>ID NL: KS.09.19_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that, where present, the jackpot is linked to a game outcome of the gambling activities and that the jackpot is part of the prize schedule of the gambling activities.	N/A
<b>73 - Regulations number Decree: R3.3</b> <b>ID NL: KS.09.20_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that the pay-out rate presented is the theoretical pay-out rate. <b>Explanatory note:</b> The theoretical pay-out rate must correspond to the pay-out rate. Below is an example with a bet of one euro. <b>Examples:</b> <ul style="list-style-type: none"> <li>• Option 1 = 0 euro (25% chance);</li> <li>• Option 2 = 0 euro (25% chance);</li> <li>• Option 3 = 1 euro (25% chance);</li> <li>• Option 4 = 2 euro (25% chance).</li> <li>• The theoretical pay-out rate = 75%.</li> </ul>	Compliant
<b>74 - Regulations number Decree: R3.2.2</b> <b>ID NL: KS.09.21_2.0</b>	

Ksa Requirement	Compliance Status
<b>Assessment standard</b> In terms of design and implementation, establish that the identity of participants in gambling is known to the licence holder.	N/A
<b>75 - Regulations number Decree: R3.2.2</b> <b>ID NL: KS.09.22_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that, in player-to-player gambling activities, the gaming system continuously analyses for collaborating or colluding players in real time.	N/A
<b>76 - Regulations number Decree: R3.2.2</b> <b>ID NL: KS.09.23_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that technical facilities are in place to recognise, analyse and record suspicious circumstances.	N/A
<b>77 - Regulations number Decree: R3.2.2</b> <b>ID NL: KS.09.24_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that, in player-to-player gambling activities, the participants are registered per game.	N/A
<b>78 - Regulations number Decree: R3.3</b> <b>ID NL: KS.09.25_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that any deviations in a mechanical Random Number Generator are recorded.	N/A
<b>79 - Regulations number Decree: R3.8</b> <b>ID NL: KS.09.26_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that the gaming system will accept the player's bet and participation only if the outcome of the immediately preceding game is certain.	
In terms of design and implementation, establish that the gaming system gives the player sufficient opportunity to influence the further course of the game.	Compliant
<b>Explanatory note:</b> Acceptance of the stake and participation shall only follow if the outcome of the preceding game is known. In relation to the last single stake for that game, the outcome must be a clear win, draw or loss. The stake in a game may also have a form that cannot be cashed in, such as "free spins", "bonus points", "bonus buys" or similar. Sufficient opportunity means there must be sufficient time to absorb information and make a choice.	Acknowledged
<b>80 - Remote Gambling Decree and Regulations: B4.34 and R3.4</b> <b>ID NL: KS.09.27_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that the rules of the game and the pay-out percentage presented for the game do not change during the game.	Compliant
<b>81 - Remote Gambling Decree and Regulations: B4.34 and R3.4</b> <b>ID NL: KS.09.28_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that each game is provided with as comprehensive an explanation of the game as possible, including instructions on how to play.	Compliant
<b>82 - Remote Gambling Decree and Regulations: B4.34 and R3.4</b> <b>ID NL: KS.09.29_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, establish that the game explanations and related instructions do not give rise to deception or misunderstanding.	Compliant

Ksa Requirement	Compliance Status
<b>83 - Remote Gambling Decree and Regulations: B4.34 and R3.4</b> ID NL: KS.09.30_2.0	
<b>Assessment standard</b> In terms of design and implementation, establish that the game explanations and related instructions are displayed using the tool used by the player for the gambling.	Compliant
<b>84 - Remote Gambling Decree and Regulations: B4.34, B4.38 and R3.4</b> ID NL: KS.09.31_2.0	
<b>Assessment standard</b> In terms of design and implementation, establish that the game explanations and accompanying instructions are in any case drawn up in the Dutch language.	Compliant
<b>85 - Remote Gambling Decree and Regulations: B4.34, B4.38 and R3.4</b> ID NL: KS.09.32_2.0	
<b>Assessment standard</b> In terms of design and implementation, establish that the game explanations and corresponding instructions are set to Dutch by default.	Compliant
<b>Explanatory note:</b> The player must be able to change their default setting after registration.	Acknowledged
<b>86 - Remote Gambling Decree and Regulations: B4.34 and R3.4</b> ID NL: KS.09.33_2.0	
<b>Assessment standard</b> In terms of design and implementation, establish that the available game explanations and related instructions are the same in all languages.	Compliant
<b>87 - Remote Gambling Decree and Regulations: B4.34 and R3.4</b> ID NL: KS.09.34_2.0	
<b>Assessment standard</b> In terms of design and implementation, establish that game explanations and related instructions are available before the player places their bet.	Compliant
<b>88 - Remote Gambling Decree and Regulations: B4.34 and R3.4</b> ID NL: KS.09.36_2.0	
<b>Assessment standard</b> In terms of design and implementation, establish that game explanations and corresponding instructions are also available during the game.	Compliant
<b>89 - Remote Gambling Decree and Regulations: B4.34 and R3.4</b> ID NL: KS.09.37_2.0	
<b>Assessment standard</b> In terms of design and implementation, establish that the game explanations and accompanying instructions contain information on the theoretical pay-out rate of the gambling activities.	Compliant
In terms of design and implementation, establish that, where applicable, the pay-out percentage is displayed for different game strategies of the player.	
<b>3.10 Addiction prevention</b>	
<b>90 - Regulations number Decree: R4.3</b> ID NL: KS.10.01_2.0	
<b>Assessment standard</b> In terms of design and implementation, confirm that the licensee will record at least the following information in relation to each player per gambling session of the player:	N/A
a. a unique signifier of the gambling session, such that this gambling session can be distinguished from other gambling sessions;	
b. the date and start time of the gambling session;	
c. the duration of the gambling session.	
<b>91 - Remote Gambling Regulations: B9</b> ID NL: KS.10.02_2.0	

Ksa Requirement	Compliance Status
<b>Assessment standard</b> In terms of design and implementation, establish that, after signing in, the player gains access to the player interface within the meaning of Section 1.1 of the Remote Gambling Decree.	N/A
In terms of design and implementation, establish that the required information as set out in Section 8(1) of the Remote Gambling Decree is accessible to the player through the gambling interface and the player interface.	
In terms of design and implementation, establish that the required information as set out in Section 8(2) of the Remote Gambling Decree is accessible to the player through the player interface.	
In terms of design and implementation, establish that the player has the option of changing their gambling account within the meaning of Section 1.1 of the Remote Gambling Decree via the player interface.	
In terms of design and implementation, establish that each accessible part of the player interface contains the following information:	
• what time it is in the Netherlands;	
• the time elapsed since the player signed in;	
• the player's balance on their gambling account.	
In terms of design and implementation, establish that the following information is displayed on the landing page of the player interface:	
• date and time of the player's penultimate registration as referred to in Section 1.1 of the Remote Gambling Decree.	
<b>92 - Section number Decree: B13</b> <b>DK NL: KS.10.03_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, confirm that the licensee records at least the following information in respect of each participant in the betting and gambling activities offered on its platform:	N/A
a. internal and external indicators (including a high or increasing gambling frequency; long or increasingly long gambling sessions; inappropriate treatment of or language in respect of other persons; stakes or betting behaviour that are different from the stakes or bets the player has made previously; expressions of frustration or discomfort; irregular gambling hours) that point to excessive participation in the licensee's betting and gambling activities or a potential gambling addiction; and	
b. the measures it has undertaken to comply with Section 18 of the Remote Gambling Decree.	
In terms of design and implementation, confirm that the licensee remotely records how often players sign in to gain access to the player interface within the meaning of Section 1.1 of the Remote Gambling Decree.	N/A
In terms of design and implementation, confirm that the licensee records the foregoing information in a way that allows for early detection of excessive participation in the betting and gambling activities organised by the licensee or a potential gambling addiction.	N/A
In terms of design and implementation, confirm that the licensee records the foregoing information in such a way that it can be traced back to the player's data.	N/A
<b>93 - Section number Decree: B14, B15</b> <b>ID NL: KS.10.04_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, confirm that the licensee records at least the following information in respect of every participant in the betting and gambling activities offered on its platform:	N/A
a. the registration, referred to in Section 1.1 of the Remote Gambling Decree, and the termination thereof;	
b. the login, referred to in Section 1.1 of the Remote Gambling Decree;	
c. the age of the player, insofar as the player is below the age of 24;	
d. the duration of the participation in betting and gambling activities;	
e. the frequency of participation in betting and gambling activities;	
f. the betting and gambling activities the player takes part in;	
g. the limits of the gambling behaviour, referred to in Section 4.14(1) of the Remote Gambling Decree;	
h. the changes to the limits of the gambling behaviour;	

Ksa Requirement	Compliance Status
i. any exceeding of the limits of the gambling behaviour;	
j. the stakes and gambling outcomes;	
k. the payment transactions with the player;	
l. the changes on the gambling account, referred to in Section 1.1 of the Remote Gambling Decree;	
m. the suspension of ability to place bets or gamble.	
In terms of design and implementation confirm that the licensee analyses the afore mentioned data and identifies signs that may point to excessive gambling and a potential gambling addiction at an early stage.	
<b>94 - Section number Decree and Regulations number Decree: B18 + R18, B19 ID NL: KS.10.05_2.0</b>	
<b>Assessment standard</b> In terms of design and implementation, confirm that if the analysis, referred to in Section 15 of the Remote Gambling Decree, points to excessive gambling or a potential gambling addiction, the licensee will take appropriate measures to prevent excessive gambling and gambling addiction to the best of its ability.	N/A
At the very least, the holder of the licence to organise remote betting and gambling activities must implement such measures if the player exceeds a limit within the meaning of Section 4.14(2)(a) or (b) of the Remote Gambling Decree.	
In terms of design and implementation, confirm that in the case of a reasonable suspicion of excessive betting and gambling or gambling addiction, the licensee will initiate a personal dialogue with the player, in which:	N/A
a. it will make the player aware of his or her gambling behaviour and of the development thereof if possible and of the dangers of gambling addiction;	
b. it will provide the player with advice regarding the facilities aimed at limiting their betting and gambling activities and regarding the assistance available from addiction treatment institutions, and encourage the player to make use of those facilities;	
c. it will investigate whether the player has the potential to cause harm to themselves or to their family as a result of excessive betting and gambling or gambling addiction;	
d. it will advise the player to make use of a facility which allows them to gain easy insight into their gambling behaviour;	
e. it will advise the player to make use of the option of having their access to betting and gambling activities offered by the licensee on its platform restricted in accordance with a maximum period of time per visit or login session to be determined by the player or during time slots determined by the relevant player;	
f. it will restrict the player's access to betting and gambling activities offered by the licensee on its platform to a maximum period of time per login session or during certain time slots without the player's consent;	
g. it will advise the player to make use of the option of excluding themselves from taking part in betting and gambling activities offered by the licensee on its platform for a fixed or indefinite period of time;	
h. it will exclude the player from taking part in betting and gambling activities offered by the licensee on its platform without their consent for a fixed or indefinite period of time.	
In terms of design and implementation, confirm that when the licensee conducts the investigation referred to in subsection 18.2(c), it will at the very least consider the impact the player's gambling is having on their financial situation, family life, health and employment status.	N/A
In terms of design and implementation, confirm that in addition to the intervention measures prescribed in accordance with Section 18(1) of the Remote Gambling Decree, the following intervention measures are applied:	N/A
a. to send the player messages via the player interface to make them aware of their gambling behaviour in a sufficiently effective manner;	
b. to advise the player to make use of the option of excluding themselves from taking part in one or more betting and gambling activities or similar types of games offered by the licensee on its platform for a fixed period of time or at certain times;	
c. to exclude the player from taking part in betting and gambling activities or similar types of games offered by the licensee on its platform for a fixed period of time or at certain times.	
In terms of design and implementation, confirm that the intervention measure prescribed in accordance with Section 18(1) is at least tailored to:	N/A
a. the player's age;	

Ksa Requirement	Compliance Status
b. the exhibited gambling behaviour;	
c. the indicators that point to excessive betting and gambling or risks of gambling addiction;	
d. the response of the player to previous intervention measures, insofar as such measures have been taken.	
1. When choosing to apply an intervention measure or the simultaneous or successive application of multiple intervention measures, the licensee shall consider the necessity, effectiveness and proportionality of such measures.	N/A
2. The licensee offering online betting and gambling activities shall in any case implement the intervention measure, referred to in Section 18(2)(a) at such a time when the player exceeds a limit within the meaning of Section 4.14(2) (a) or (b) or the Remote Gambling Decree.	N/A
3. The licensee shall provide a clear and comprehensible outline of the reasons for each intervention measure when applying such measures.	N/A
<b>95 - Regulations number Decree: R15 DK NL: KS.10.06_2.0.</b>	
<b>Assessment standard</b> In terms of design and implementation, confirm that the licensee will regularly use the player interface to remind players of the restrictions they themselves have placed on their own gambling behaviour, either by means of popups or by means of some other, equally effective type of message, whenever the player signs in or out of the online betting and gambling activities organised by the licensee, and whenever they switch to a different game.	N/A
<b>Explanatory note:</b> Effective messaging in any case means that the licensee must regularly remind the player of the limits they have set with regard to their own gambling behaviour. This section prescribes that the licensee must in any case send the player messages via the player interface, either by means of popups or by means of some other, equally effective type of message, whenever the player signs in or out of the online betting and gambling activities organised by the licensee, and whenever they switch to a different game, for example, when a player switches from a blackjack session to the virtual slot machines. This will make the player repeatedly aware of their gambling behaviour and of the intended gambling limits at times when this does not unduly hinder their gambling experience. This could otherwise lead to the popup losing its useful effect.	Acknowledged

## 4.2 Return to Player

The Client has provided Mathematical treatise of the game which included calculation of theoretical RTP. **ga** performed independent calculations and confirmed the theoretical RTP provided in mathematical treatise and advertised in game rules. No issues were found.

Game Name	Simulation of games run	Return to Player (RTP%)	Actual RTP (calculated from simulated game results)
Reels Room	01 million	70.00%	70.00%

## 5 References

1. Netherlands Gambling Authority (Ksa: Kansspelautoriteit) Remote Gambling Gaming System Assessment Scheme (Conformity assessment scheme), Version 2.0.
2. RNG Report “609RN-330-PPL-21-01-609\_1 - Random Number Generator, version 2.0.pdf” no version, date 15-09-2021.
3. Game Simulation “Simulation for GA (bingo90, rtp70) with jp.xls”, no version, no date.
4. Game Description “Reels Room Info and UI.pptx”, no version, no date.

**Annex A : Hashes of Critical Components**

The following hashes of critical components for the product tested are recorded.

Game Name	File names	Fingerprint SHA1
Reels Room	bingo-jackpot-logic-1.2.jar	e0b2108733adf8e8e75006ae6dc730e573f66b78
	bingo-core-logic-1.2.4.4.jar	337e872421be41bf3a91d08f6999320669a3705d
RNG	RNG.jar	b33e33da96c37c0eb2d02b3fbf439685fcda876c

## Annex B : Game Assessment Plan

The assessment plan for evaluation of online games is described below:

ONLINE GAME ASSESSMENT PLAN				
<b>Assessment item:</b> Online game		<b>Game name:</b> Reels Room		
<b>Game type:</b> Bingo game		<b>Channels (Game clients):</b> Desktop and mobile		
<b>Jackpot:</b> NO		<b>Game version:</b> N/A		
<b>Jurisdiction:</b> Netherlands		<b>Technical Standard:</b> Remote Gambling Gaming System Assessment Scheme (Conformity assessment scheme), Version 2.0.		
<b>Assessor/s:</b> Muhammad Arbaz Shahid, Wajahat Kashan				
<b>Test environment and access method:</b> Supplied by client and accessed remotely from our white-listed IPs				
<b>Test procedures for all game related Ksa requirements:</b> Netherlands testing procedures v1.0				
ASSESSMENT MATRIX				
Ksa requirements	A	B	C	D
Assessment framework				
Regulations 3 to 13 - Payment transactions	X		X	
Regulations 54 to 63 – Gambling technology	X		X	
Regulations 64 to 68 – RNG requirements		X	X	X
Regulations 68 to 89 – Gambling technology (game requirements such as game rules, artwork, game functionality, return to player, game information recording, and jackpot)	X	X	X	X
Regulations 90 to 95 – Addiction prevention	X		X	
Game elements	A	B	C	D
Game rules	X	X	X	

## ONLINE GAME ASSESSMENT PLAN

Artwork	X			
Game functionality	X	X	X	
Return to player		X	X	X
Game information	X		X	
Jackpot	X	X	X	
<b>KEY:</b> <b>A:</b> Functional testing <b>B:</b> Source code review <b>C:</b> Documentation review <b>D:</b> Calculation/Simulation				
<b>Assessment methods:</b>	<b>Assessment instruments required for each method</b>			
1. Functional testing 2. Source code review 3. Documentation review 4. Calculation/Simulation	1. Test environment, test procedures 2. Game source code 3. Game submission including specifications, maths, rules, help files 4. Game maths, game simulator			
<b>Place or Context for assessment to occur (onsite/remote):</b> Performed remotely				
<b>Materials/resources/any documents needed for assessment:</b> <ol style="list-style-type: none"> <li>1. Test environment</li> <li>2. Documentation (game rules, help files, maths)</li> <li>3. Game source code</li> <li>4. Game simulator for actual RTP calculation</li> <li>5. Supervised build (remote) to verify source code and binaries used for game and to obtain hashes for future verification</li> </ol>				
<b>Special arrangements for assessment:</b> <ol style="list-style-type: none"> <li>1. Test environment and simulator supplied by the client</li> <li>2. Remote session for supervised build</li> </ol>				
<b>Assessment result:</b> <div style="color: green; font-weight: bold; font-size: 1.2em;">COMPLIANT</div>				
<b>Non-conformities (provide a summary and reference to details):</b>				

**ONLINE GAME ASSESSMENT PLAN**

None

**Reports generated for this assessment:**

1. Game Conformity Assessment report
2. Summary of the Assessment report

**End of document**