

Switzerland Games Conformance Criteria



Report Number:	PPL-CH-221128-01-GC-R2
Item(s) Tested:	Pragmatic Play Ltd Game – Spaceman
Item(s) Version:	1.62.3
Checklist Completed By:	Shahzaib Rasool Khan
Checklist Reviewed By:	Wajahat Kashan
Date:	2023-07-10

Testing Requirements Document:	Certification Protocol Based on the Ordinance on Gambling (OJAr) 7 November 2018 Classified Compilation of Federal Legislation 935.511 and the Ordinance on Casinos (OMJ) 7 November 2018 Classified Compilation of Federal Legislation 935.511.1 (Version 1.1 – 01.10.2019)
Other Supporting Documents:	Ordonnance sur les jeux d'argent (OJAr), the Swiss Ordinance on Money Games, 7 November 2018: Classified Compilation of Federal Legislation 935.511
	Ordonnance sur les maisons de jeux (OMJ), the Swiss Ordinance on Casinos, 7 November 2018: Classified Compilation of Federal Legislation 935.511.1
	Federal Act on games of chance (LJAr) of 29 September 2017

Instructions to the Evaluator:

Scope of Testing: Online Games

The format of this Conformance Criteria is as follows:

In the Result column indicate one of the following:	<u>Pass:</u> The element tested conforms to the requirements of the section;
	<u>Fail:</u> The element tested does not conform to the requirements of the section;
	<u>N/A:</u> This section is not applicable to the element being tested
In the Explanation column indicate one of the following:	Any condition or comment that will need to be included in the final report.
	If N/A is listed in the Result column, an explanation of why it is not applicable must be provided.

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Requirement set from ESBK	Verification Method	Comments	Result	Explanation
The version of the game needs to be displayed to the player either in help text or on the screen.	<i>ESBK requires the version of the game as displayed to the player to match with the one listed in the report.</i>		Pass	The version of the game has been provided in the online game rules.

Jurisdictional Requirements:

Requirement set from ESBK	Verification Method	Comments	Result	Explanation
4.1 SECTION 1: GENERAL REQUIREMENTS				
Article 2 LJAr Aim				
The purpose of this Law is to ensure a safe and transparent operation of money games.		Any mechanism that misleads the player is prohibited. A lack of information about unconventional game behaviour or game conditions can also be a breach of the game transparency. This general legal requirement shall be met at any time during the review of the technical regulations hereafter. If an event is not covered by these technical requirements, it should be interpreted in accordance with this general legal requirement.	Pass	
Article 4 OMJ Casino games				
1 The Casinos may operate the following casino games, as long as they meet the requirements of Article 3 OJA:	This shall be tested or stated by code review.	The new Law distinguishes in its terminology only between table games, jackpots and automated money games (before slot machines). Article 3 OJA limits the number of players who can participate simultaneously in a casino game to a maximum of 1000 (mostly relevant for live online games and shall therefore be checked while testing the operator's platform for online gaming). This limit does not apply to	Pass	The game is a common round/draw game, comparable to a table game. The maximum number of participants in a single round is limited to 1000. The game is not linked with a Progressive Jackpot.

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		jackpot systems. If necessary, the condition section of the certificate defines the way to assure and to verify this limit.		
a. Table games.	This shall be tested or stated by code review	<p>The list of admitted table games according to Article 4 paragraph 2 OMJ (relevant in particular for live online games):</p> <ul style="list-style-type: none"> a. Jeu de la boule; b. Roulette; c. Wheel of fortune / big wheel; d. Blackjack; e. Punto banco; f. Baccarat / Chemin de fer; g. Poker; h. Casino stud poker; i. Sic bo; j. Craps. <p>Other types may be accepted after consulting of the FGB.</p>	N/A	The game is not a table game.
b. Automated money games;	According to each technical requirement explained further in this document.	Each online game (incl. table online game) shall fulfil the requirements of the automated money games. Exceptions are explicitly written in the articles.	Pass	
c. Jackpots.	The jackpot to be verified, should be consistent with the definition and all requirements listed in section 1 (4.1) and section 4 (4.4) of Certification Protocol.	<p>According to Article 15 OMJ, a jackpot corresponds to the following definition:</p> <p>1 The jackpot is an additional game, whose payoff is financed either by a portion of the bet of the base game or by a separate bet. The activation of the winnings can be determined by the result of the basic game or by an independent control device.</p> <p>2 Players' participation in the jackpot may be subject to conditions. These must be communicated to them.</p> <p>In this regard, time-based jackpots are allowed if all the requirements of the verification method as</p>	N/A	The game is not linked to Jackpot

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		described below are fulfilled.		
4.2 Section 2: General Requirements On Automated Money Games				
Article 5 OMJ Pay-out ratio				
Each casino game must have a theoretical redistribution rate of at least 80% but not more than 100%.	The theoretical pay-out ratio shall be verified using mathematical analyses or by simulation.	<p>Pay-out ratio= total win / turnover [in percent]. Also called Return to the player (RTP).</p> <p>For games involving a possible choice of the player (e.g. black jack, poker, ...), the minimal pay-out ratio is calculated taking in account the auto-hold decision of the game when any, or a strategy of an average level player. This information is mentioned in the certification report (certificate).</p>	Pass	<p>As displayed in online game rules theoretical RTP% is: 95.50%</p> <p>Verification of actual RTP% has been performed using 10 million simulated games result data utilizing the ESBK certified RNG and calculated as below: 95.50%</p> <p>Actual RTP% calculated is close to the RTP% displayed in online game rules</p>
Article 7 OMJ Game results				
The results of the game shall be determined only by invariant parameters. Any mechanisms such as a compensator or regulator are forbidden.	If player's actions can influence the events or results of play, this shall be included in the verification of the automated money game in such a way that whatever actions the player performs, the machine shall meet with the law. Deliberate actions of the player to his disadvantage are excluded from testing, such as the cancellation of auto holds. The pay-out ratio as mentioned before must be respected.	<p>The random part of the automated money game shall guarantee that all the requirements of the Law are met.</p> <p>Outcomes generated by the automated money game shall always be random. This is the case if: the events are produced by a random number generator or other means based on chance and if they cannot be influenced in the slightest extent by the players.</p> <p>The use of near-miss features is not permitted.</p> <p>A parameter is considered as « invariant » if it is not influenced by any mechanisms of compensation or regulation based on the results of previous games. Some results may be transferred on several games (e.g. accumulated credits or points) if:</p> <ul style="list-style-type: none"> - the goal is not to compensate the result 	Pass	

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		<p>of previous games</p> <ul style="list-style-type: none"> - the safe and transparent operating of the game is not affected 		
Article 8 OMJ Beginning and end of a game				
<p>A game begins when the player triggers it by placing a bet; it ends with the verdict of gain or loss before a new bet is required to begin a new game.</p>		<p>An entire game may be composed with several partial games in which a new bet may be asked to the player (ex. 2 hands on poker or "beat the devil" game). In this case, the game ends at the final verdict of win or loss. The max bet of 25 francs in B casinos applies on the entire game. It shall always be possible to quit a sequence of games after a partial game. The limitation of the bet for B casino shall not affect the possibility of the player to win the advertised top award.</p> <p>Bets during a game (e.g. paying from the credit meter for the second hand in a poker) are allowed for the same player only.</p> <p>The way the game meter is incremented on the AMG remains independent of this game definition.</p>	Pass	
Article 11 OMJ Control and operation for automated money games				
<p>1. All automated money games must:</p> <p>a. Be able to resume operation after a power cut without loss of data;</p>	<p>It shall be verified by a source code evaluation that all information on the current game, settings and data recorded are restored after a power cut.</p> <p>Furthermore, a live test shall be performed where the plug of the automated money game is pulled in different game situations. The same shall be checked for using the power switch.</p> <p>For automated online money games this prescription shall be</p>	<p>This includes restoring the results after the power cut has been resolved.</p>	Pass	

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	verified through functional tests and/or other best practice methods.			
b. Have an internal diagnosis system (Article 12 OMJ);	This shall be verified through functional tests and/or other best practice methods.	In accordance with Article 39 OMJ the diagnosis system shall transmit the stored data to the platform on a regular periodically basis before deleting them from its data storage medium, as the platform shall send this data to the DSD.	N/A	Out of scope of evaluation
c. Have an internal or external random number generator to determine the events and results of play;		if the random number generator is not directly connected to the automated money game, it shall be on the platform.	Pass	
d. Be protected from external influences, namely from electromagnetic and electrostatic interference;		Communication interfaces may also cause inappropriate external influences. The core of the AMG shall be protected against unauthorized access using such interfaces.	Pass	
e. Be equipped with electronic counters.	The electronic meter shall be verified through functional tests and software review.	Not applicable to online games.	N/A	Not applicable to online games.
2 The reliability of the random number generator must be demonstrated either by recognised probability calculation methods or by another procedure that is recognised by the FGB:	<p>A selection process will be considered random if it meets at least the following requirements:</p> <p>A. Each card, number or stop satisfies the 99 percent confidence limit using the standard chi squared analysis. "Chi squared analysis" is the sum of the squares of the difference between the expected result and the observed result.</p> <p>B. Each card, number and stop does not produce a significant statistic with regard to</p>	<p>In case of a physical RNG Article 10 OMJ applies.</p> <p>To prevent the predictability of the outcomes, the seed value shall be chosen randomly.</p>	N/A	Out of scope as this is RNG requirement.

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	<p>producing patterns of occurrences. Each card number or stop will be considered random, if it meets the 99 percent confidence level with regard to the “runs test” or any similar pattern testing statistic. The “runs test” is a mathematical statistic that determines the existence of recurring patterns within a set of data.</p> <p>C. Each card number, or stop position is independently chosen without regard to any other card, number or stop within that game play. This test is the “correlation test”. Each pair of card, number, or stop position is considered random if it meets the 99 percent confidence level using standard correlation analysis.</p> <p>D. Each card number, or stop position is independently chosen without reference to the same card or number position in the previous game. This test is the “serial correlation test”. Each card or number position is considered random, if it meets the 99 percent confidence level using standard serial correlation analysis.</p>			
Article 26 OMJ Recording of the game results				
All events and the results of the game, as well as all other information of the current game and at least of the four previous ones must be registered.	This shall be verified through functional tests and/or other best practice methods.	<p>This requirement is intended to ensure the transparency of the game and to enable investigation if needed.</p> <p>All results visible by the</p>	Pass	All results are clearly visible to player and recorded.

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		player during the game shall be registered. Only the effective result is registered, not the other potential wins (e.g. only the picked box within the bonus). It is not mandatory to register the image of all sequences, but the information of the results.		
Article 27 OMJ Automatic repetition				
If an automatic repetition of the game mode is triggered, the player must be able to stop the game after the end of the game in progress.	This shall be verified through functional tests and/or other best practice methods.	When playing the game, the next game should require the payment of a new bet.	Pass	During the automatic game, the player can stop the game at any time.
Article 28 OMJ Casino games tournaments				
1 Casinos may organise casino games tournaments	The use of the tournament mode without affecting the gross gaming revenue shall be verified through functional tests and/or other best practice methods.	A tournament game proposed online shall be certified with its own certificate.	N/A	This is not a tournament game.
Article 30 OMJ Game rules				
The game rules shall contain at least the information on the: a. Gameplay; b. Way of engaging the bets; c. Minimum and maximum bets; d. Winning combinations;	Visual checks shall be performed to ensure that the information given to the player is correct and meets the settings in the software and the layout of the automated money game. If applicable, the source code shall be verified to ensure consistence between layout and reality.	The operator must ensure the correct translation of his offer. The certification institute is requested to test standard version.	Pass	
4.2.1 SECTION 2A: ADDITIONAL REQUIREMENTS FOR LAND-BASED AUTOMATED MONEY GAMES				
Article 10 OMJ Data storage for mechanical random number generators				
Roulette and other games for which the result is determined solely by a mechanical random number generator, may only be used if the numbers are collected or documented electronically or by other means.		This requirement applies in case of use of a physical RNG. In particular the roulette games, "la boule", the automated sic bo, the automated craps and the big wheel (wheel of fortune). This does not apply to cards. The raw outcome	N/A	This is not a game for which the results are determined by a mechanical random number generator.

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		<p>sequences of the RNG shall be available at least for the past 5 years.</p> <p>This implies that:</p> <ol style="list-style-type: none"> 1. The outcome sequence contains at least the spin numbers and the timestamp. 2. An export of the data shall be possible in electronic form suitable for further processing and statistical purposes (e.g. csv files). 3. The records shall not be affected by a modification of the gaming configuration, a reboot or a loss of power supply. <p>A brief description of the points above shall be written in the examination report.</p> <p>If the product certified does not fully comply with those requirements, a condition shall be added in the condition section of the certificate stating that the gaming device shall only be operated if the required data are recorded in another way and an appropriate manner.</p> <p>Online scope: This requirement is also required when testing table games for online live gaming.</p>		
4.2.2 SECTION 2B: ADDITIONAL REQUIREMENTS FOR ONLINE CASINO GAMES				
Article 65 OJA Information technology security for online games				
2 The operator may only purchase online games from suppliers who fulfil the requirement referred to in paragraph 1.	To fulfil this obligation, the existence of the supplier's certification must be established and confirmed in the report.	The requirement in paragraph 1 is for the operator to be ISO/IEC 27001:2013 certified. Therefore, a valid ISO/IEC 27001:2013 shall be provided from the supplier. A partial	Pass	<p>Pragmatic Play Ltd is ISO/IEC 27001:2013 certified.</p> <p>Details:</p> <p><u>Document:</u> Information Security Management Systems - ISO/IEC 27001:</p>

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		compliance does not conform the standard required by the ISO/IEC 27001:2013 standard.		“Сертификат_Pragmatic Play_27001_en_pdf” <u>Reference number:</u> 44 121 21 00 02 <u>Issued by:</u> Information Management Systems (IMS) <u>Issue date:</u> 29/03/2021 <u>Validity:</u> 28/03/2024
Article 25 OMJ Game Interruption				
1 The interruption of an online casino game shall not bring harm to players.	This shall be verified through functional tests and/or other best practice methods.	The term interruption includes any malfunction. When the game is in auto-play mode, it is necessary to check before each credit deduction if the terminal is connected. Manual settlements of interrupted games are not allowed. To our understanding, the interruption of the game does not affect the outcome of the game. The game should not take automatically decision that would result in a loss of already acquired wins. It should also avoid the player to take advantage forcing on purpose a disconnection with the online casino (safety of the game).	Pass	
2 In event of an interruption, the winnings of the game in progress shall be credited into the player's account and no further bets can be withdrawn as long as the player's terminal is not connected.			Pass	If the game is interrupted, the winning of the game in progress is credited into player's account without affecting game outcomes and the player is not allowed to place further bets until the connection/ session is re-established. It is stated in the game rules “Malfunction voids all pays and plays”. The game behaves in a similar way in auto-play mode.
Article 46 OMJ Documentation of the casino games				
3 The FGB may require the following indications and documents concerning automated money games operated online: a. Name and address of the supplier and name and address of the manufacturer, if different; b. Description of the hardware and software used, such as performance diagrams for example; c. Instructions on how to play; d. Description of the examination procedure applied; e. Function and structure of the		All relevant documents for testing shall be required from the manufacturers / suppliers and stored by the certification institute. In case of doubt, all documents shall be available to the certification institute for investigation purposes.	Pass	All required information and documents are provided by Pragmatic Play Ltd

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random number generator; f. Description of how the various facts and results related to gambling occur; g. Maximum pay-out in a single play; h. Calculation method and results of game statistics; i. Number and results of the performed tests or simulations of games; j. Return to player ratio; k. Chances of winning; l. Source code; m. Method that allows a safe identification of the game;				