

**Certification Report for Spaceman**

Report Identification

PPL-IT-230614-01-GC-R1

Certification Laboratory

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Signature

ISO/IEC 17025:2017

UKAS accredited testing laboratory no. 9263

Date of issue of Certification

14 June 2023

Report prepared for

Pragmatic Play Ltd  
Block E, Falcon House, Main Street,  
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Malta

Compliance Status

Compliant

Jurisdiction

Agenzia delle Dogane e dei Monopoli, Italy

Technical Standard used for  
testing

Guidelines for the Certification of Gaming Platforms,  
Version 2.1, 1 January 2021

**Gaming Associates**

## 1. Notations

### 1.1 Confidentiality

This document, all related documents, and methodologies embodied in this document and related documents (“the documents”) are the property of Gaming Associates (ga). Unauthorised copying and distribution of the documents, by any means, on any media is prohibited.

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.

### 1.3 Document Control

Version	Description	Date
V0.1	Initial draft – ZGUL	2023-06-08
V0.2	Reviewed & Updated – WKAS	2023-06-09
V0.3	QA - UVAS	2023-06-12
V1.0	Report issued to Pragmatic Play	2023-06-14

## 2. Executive Summary

### 2.1 Introduction

Pragmatic Play Ltd has requested Gaming Associates (**ga**) to certify their game(s) against Agenzia delle Dogane e dei Monopoli (ADM) Guidelines for the certification of gaming platforms, version 2.1, 1 January 2021.

The evaluation started on 30 May 2023 and concluded on 07 June 2023.

### 2.2 Scope of Testing

The game has been tested against game specific requirements listed in the following sections of ADM Guidelines for the certification of gaming platforms:

- ♠ Section 2.6 Game Requirements
- ♠ Appendix K: Other games

### 2.3 Test Environment

Testing was performed remotely using the test environment provided by Pragmatic Play.

### 2.4 Conclusions and Recommendations

The game(s) complies with the requirements of the Agenzia delle Dogane e dei Monopoli (ADM) Guidelines for the certification of gaming platforms, version 2.1, 1 January 2021.

**ga** recommends that the game(s), listed in section 3.1 Test Summary, to be approved for use in Agenzia delle Dogane e dei Monopoli (ADM) approved platform production systems.

### 3. Details of Hardware Components

Not Applicable.

This report relates to the compliance evaluation of game and does not involve evaluation of any hardware.

## 4. Details of Software Components

### 4.1 Test Summary

Game Name: Spaceman	
Channels (game clients):	HTML5: Desktop and Mobile
Game Code:	N/A
Game Version:	1.60.22
Game Type:	Other Game
Standard deviation:	96.13
The theoretical return to player:	95.50%
Manufacturer:	Pragmatic Play Ltd
Licensee:	N/A
Jackpot:	No
Game Description	
<p>Spaceman is an online multiplayer game of "Crash" type. It consists of a multiplier that grows from 1.00x up to a random, predetermined value when it crashes. Your objective is to cash out before the crash occurs in order to win your bet multiplied by the current multiplier. Please kindly note that Spaceman is not a game of skill. Your choice has no impact on the game other than deciding when to cash out. Our cute spaceman character will join you in your quest.</p>	
SHA-1 Hashes of critical game files	
Critical Component	SHA-1 Hashes
SpaceManRNGObject.class	d060b63b5707666ce67386eb89e95c311bfa2ebf
SpacemanSecondLevelRngConfiguration	868735fd0446e6f561c41aaa9328d1cfcc8bf23d
SpacemanFirstLevelRngConfiguration	8db017e2163384ef1a8aefceaccb72f4af5f8bc3
ResultCodeVO.class	f7ff44c528a4c6f22a90e936cc299c497045d6b3
BetCodeVO.class	1e0c535c5357f06538b84b936aa34670d86bb931

RNG Hashes	
Report Reference: 330RN-400-PPL-22-02-330_1 - Random Number Generator.pdf	
Critical Component	SHA-1 Hashes
dh-rng-1.0.0.jar	B33E33DA96C37C0EB2D02B3FBBF439685FCDA876C

## 5. Details of Tests

The game(s) has been tested against ADM requirements listed in Section 2.2 Scope of Testing of this document using in-house developed test scripts. The testing included:

- ♣ Functional testing;
- ♣ Source code review;
- ♣ Emulation of game payout combinations; and
- ♣ Calculation of return to player.

The test results have been provided in Section 6 Test Results against ADM requirements.

## 6. Test Results

The following table provides compliance status of the game(s) against ADM requirements.

ADM Guidelines	System Compliance	Comments
<b>2.6 GAME REQUIREMENTS</b>		
<b>2.6.1 [GAME FAIRNESS]<sub>ACC</sub></b>		
1. Games must not be designed to give the player a false expectation of better odds by falsely representing any event.	Compliant	The game design does not give the player a false expectation of better odds by falsely representing any event.
2. Near-miss games that are specifically designed to give the player the perception that they almost won the top prize (i.e.: with a frequency greater than that which would naturally occur given the game rules), in order to induce the player to continue gambling, are not permitted.	Compliant	There is no near-miss game.
3. As regards games of chance with fixed odds and non tournament card games, games that are designed to give the player the perception that they have control over the game due to player skill, when in fact the results are completely random, are not permitted	Compliant	The game does not give the player a false perception of having control over the game. The game results are based on random numbers generated by an RNG.
4. Each game must be accompanied by associated rules (complete with jackpot use specifics with particular reference to the RTP%) and game instructions. These rules and instructions shall be available online	Compliant	The game rules with game instructions and RTP% are available.
5. The general winning odds, as regards games of chance with fixed odds and non tournament card games, must be available online.	Compliant	
6. The rules of the game must not be unfair or misleading.	Compliant	The game rules are not unfair or misleading.
7. Game rules must not be changed during a session unless effective notification is given to player.	Out of scope	The licensee operating the ADM-approved platform running this game will be responsible for meeting this requirement.
8. Game rules must not be changed in the interval between a player making a bet and the outcome as well as the payment of winnings for the bet.	Out of scope	The licensee operating the ADM-approved platform running this game will be responsible for meeting this requirement.
9. Games must operate and interact with the player strictly in accordance with the published rules.	Compliant	The game operates and interacts with the player in accordance with the published rules.
10. Automatism that place bets or bet sequences in automatic way are not allowed without explicit acceptance action of the player. In particular, it is not allowed that the game system suggests or re suggests previous games autonomously and that when the established time is up are accepted by the system without an explicit authorization by the player (e.g.: last bet repetition).	Compliant	
11. Free game play sessions must be available to the player for learning. These sessions cannot differ in any aspect and must assure the same behaviour to the ones where money is used. In particular, they must use the same RNG and the same game logic in full compliance with the published rules. In case of games with the presence of a Live Dealer, it is permitted the offer of free game session through simulation or games without the Live Dealer but with the same behaviour.	Compliant	
<b>2.6.2 INADMISSIBILITY OF ADAPTIVE</b>		

ADM Guidelines	System Compliance	Comments
<b>BEHAVIOUR IN GAMES</b>		
The player who plays a game that is represented as being based on a random event must have an equally likely chance of obtaining any possible combination every time a game is played (except for that which is provided in the game rules). Thus, it is unacceptable, as regards games of chance with fixed odds and non tournament card games, for the RTP to be manipulated by the system or manual intervention to keep it constant.	Compliant	The game results are based on random numbers generated by an RNG.
<b>2.6.3 INADMISSIBILITY OF FORCED GAME PLAY</b>		
The simple selection of a game from the game menu must not force the player to take part to the game.	Compliant	The player is not forced to play a game just by selecting that game.
In case the integration of newly certified games in previously certified gaming platforms causes a change in the method of selection of a game from the menu, this method must be reviewed and re-approved by the ATF before these games can be offered.	Acknowledged	
<b>2.6.4 GAME PLAY REQUIREMENTS</b>		
1. The following information must be displayed on the game screen (the web page or any other application on which the game actually runs) or readily accessible via a direct link:	Acknowledged	
a) Game name,	Compliant	The game name is displayed on the bet screen.
b) Instructions (and restrictions) on game play, including the indication of all prizes, special features and, as regards games of chance with fixed odds and non tournament card games, the payable	Compliant	Vengono fornite le istruzioni sul gioco.
c) Current account balance displayed in currency,	Compliant	The current account balance is displayed on the game screen in currency.
d) Unit and total bet.	Compliant	The unit bet and total bet are displayed on the bet screen.
2. If, following the integration of newly certified games on previously certified game platforms, the display of detailed information related to a), b), c), and d) will appear in different parts of the game platform, this information must be reviewed and re-approved by the ATF before these games can be offered.	Acknowledged	
3. The following principles must be followed where games are provided in different language versions:	Acknowledged	
a) Each language version of the same game must provide the same mechanism of determination of the prizes or in games of chance with fixed odds and non tournament card games, all version must provide the same %RTP	Compliant	Each language version of the same game has provided the same mechanism of determining of prizes.
b) Each language version must be consistent with the instructions (and restrictions) for that version,	Compliant	
c) All game information must be provided in Italian language and must be correct from a grammatical and syntactical point of view. It will be not necessary to provide a strict translation when using known common technical terms and borrowed by other languages (i.e. check, bet, etc.).	Compliant	All game information is provided in Italian.
d) Information on the game must be provided at least in Italian language;	Compliant	All game information is provided in Italian.
e) In games with a Live Dealer, at least one option must be available to the player for each kind of game (Roulette, Blackjack, etc.), where the dealer is Italian speaking. An exception to this rule may be allowed for	N/A	This game is not associated with a live dealer.



ADM Guidelines	System Compliance	Comments
a maximum period of sixty consecutive days in order to allow the possible trial of new games. The language used by the dealer must be clearly visible to players before accessing the game.		
f) The game instructions (and restrictions) must carry the same meaning across all language versions so that no one version is advantaged or disadvantaged.	Compliant	Each language version of the same game has provided the same information on the determination of the prizes.
<b>2.6.5 GAME DESIGN</b>		
1. All critical functions, including -as regards games of chance with fixed odds and non tournament card games- the generation of the game outcome and of the relative RTP, must be generated by the RGS, independently of the end player device.	Compliant	The generation of game results is independent of the end player device and takes place in the RGS.
2. The game outcome determination must not be affected by the effective bandwidth, link utilisation, bit error rate or other characteristic of the communications channel between the RGS and the end player device.	Compliant	Game outcomes are not affected by the bandwidth, etc.
3. Multiple versions of one game (where the parts that can change are the rules and/or the behaviour in the essential parts and not configurable in any way by the licensee, such as, for example, the card dealing, the prizes assignments tables, etc) are not acceptable, except where those alternative variations have been approved by the ADM.	N/A	The game rules and/or the behavior of the game cannot be configured or changed by the licensee.
4. The %RTP of each game must conform to the following minimum requirements:	Acknowledged	
a. for skill games and tournament based card games, the %RTP must be 80% or greater, after the deduction of any share set aside for jackpots.	N/A	
b. for games of chance with fixed odds and cash prizes, the overall %RTP, also including the %RTP of secondary game phases, must be 90% or greater, after the deduction of any share set aside for jackpots.	Compliant	The RTP% for this game is: 95.50%
c. for non-tournament multi-player card games, the %RTP must be 90% or greater, after the deduction of any share set aside for jackpots.	N/A	
d. for single player card games, the %RTP of a player who follows a perfect gaming strategy must be 90% or greater, after the deduction of any share set aside for jackpots.	N/A	
e. For the game of Bingo, the RTP% is at least 70% of the collection	N/A	
5. The %RTP for each game must be specified by the licensee in the game documentation.	Compliant	Information on the percentage return to the player of the game is provided in the game documentation.
6. Where a progressive prize is offered, the calculated %RTP must include such factors as the base game %RTP, progressive start-up value, progressive increment rate, etc.	N/A	There is no progressive prize offered for this game.
7. As regards games of chance with fixed odds and non tournament card games, the %RTP of a game must not only be theoretical but also demonstrable and must be of a similar %RTP to those games typically found in traditional land-based gambling venues. Where a game does not have a traditional land-based equivalent, ADM reserves the right to withhold game approval if, in its judgment and having considered all circumstances, the %RTP is not regarded as fair and reasonable.	Compliant	The RTP% for this game is: 95.50%
8. As regards games of chance with fixed odds and non tournament card games with a skill component,	N/A	

ADM Guidelines	System Compliance	Comments
the calculated %RTP must be based on the so-called “Perfect player strategy” or on the closest strategy to it. In addition, said strategy must be reasonably achievable by the player in order to ensure fair conditions.		
9. Where a game is represented or implied to include a simulation of a real-life physical device, the behaviour of the simulation must be identical to the expected behaviour of the real-life physical device. That is:	N/A	No real-life physical device is represented.
a) The visual representation of the simulation must correspond to the features of the real-life physical device,		
b) The probability of any event occurring in the simulation must be equivalent to the real-life physical device,		
c) Where the game simulates multiple real-life physical devices that would normally be expected to be independent of one another, each simulation must be independent of the other simulations, and		
d) Where the game simulates real-life physical device that have no memory of previous events, the behaviour of the simulations must be independent, thus not correlated to their previous behaviour, so as to be non-adaptive and unpredictable in practice.		
10. Games that are not completely independent of game play history (e.g.: metamorphic games) must:	N/A	The game is not a metamorphic game.
a) Display clearly to the player which game rules apply to the current game status		
b) Provide to the player sufficient information to indicate the current status towards the triggering of the next metamorphosis of the game (e.g.: the eventual need of game credits will have to be indicated, the number of missing game credits or the total number to activate the subsequent metamorphosis, in addition to the number of credit games collected up to that point),		
c) Not adjust the likelihood of a metamorphosis occurring based on the history of prizes obtained in previous games (e.g.: a game must not adapt its %RTP on the basis of past payouts)		
d) Not be designed in such a manner to be misleading to the player.		
With metamorphic games it is understood to be a game where the result can be dependent on previously played games, for example the cumulative result of a series of games might activate further free games, games with specific characteristics or special prizes (other than the jackpot). During these games, virtual coins/points/credits are assigned to the player for subsequent use. The outcome of metamorphic games is not completely independent from the player's game history.	Acknowledged	
<b>2.6.6 GAME PLAY</b>		
1. Game play that requires monetary payment (i.e.: play-for-real) can only occur during a game session (i.e.: after the player has logged in, and before the player has logged out).	Compliant	The game can only be played during a game session and the player has to login to establish a session with the RGS.
2. In case of tournament games with direct or indirect interaction, it is possible for the active or passive logout action of a player not to determine the conclusion of the participation of said player to the tournament, so as to prevent disturbance to the normal progression of a game for the other players involved. The game	N/A	

ADM Guidelines	System Compliance	Comments
progression mechanism after the player's logout shall be evaluated by the ATF on a case by case basis.		
3. In case the integration of newly certified games in previously certified gaming platforms causes a change to the way the game progresses after the logout of the player, this method must be reviewed and re-approved by the ATF before these games can be offered.	Acknowledged	
4. Where external links are used to supply game information as required by these Guidelines, game play must not occur if said information is not available. The availability of this information must be checked (either manually or automatically) at least daily:	N/A	The link to the game information is within the RGS.
a) Where a broken external link is uncovered, and it relates to game-specific information only, then the associated game(s) must be taken offline (either manually or automatically) if the link is not repaired within one hour		
b) If a broken link is uncovered, and it relates to the website as a whole, then all games must be taken offline (either manually or automatically) if the link is not repaired within twelve hours.		
5. In the event that a game cannot be continued due to an RGS malfunction, all bets must be reimbursed to the players of that game, with the exception of the various foreseen conditions for specific game types (e.g.interactive tournament games). The operator is in charge of the total reimbursement of game plays.	Out of scope	The licensee operating the ADM-approved platform running this game will be responsible for meeting this requirement.
6. If the RGS extends an invitation to play a particular game, it must accept all legitimate wagers (as defined by rules) for that game.	Compliant	All legitimate wagers are accepted by the game.
7. The methodology employed by a player to select and play a particular game must be transparent.	Compliant	The procedure for selecting and playing the game is not ambiguous.
8. The RGS must clearly inform the players of all games available at that time.	Compliant	All available games can be seen from the game menu.
9. In the event of the integration of new certified games in previously certified game platforms, the information about all the games present in that moment in the gaming platform must be reviewed and re approved by the ATF before these games can be offered.	Out of scope	The licensee operating the ADM-approved platform running this game will be responsible for meeting this requirement.
10. The player must at all times be made aware of which game has been selected for play or is being played.	Compliant	The game name is displayed on the game screen throughout gameplay.
11. A 'replay last game' facility must be provided, either as a re-enactment or by description. The replay must clearly indicate that it is a replay of the previous game, and must provide the following information (at a minimum):	Acknowledged	
a) The date and time the game was played,	Compliant	The date and time the game was played are provided in the game history.
b) ID code of the game assigned by the ADM, complete with timestamp;	Out of scope	The licensee operating the ADM-approved platform running this game will be responsible for meeting this requirement.
c) The display associated with the final outcome of the game, either graphically or via a text message,	Compliant	The final position of the game is displayed.
d) Amount of bet including, as regards games of chance with fixed odds and non tournament card games, any multiplier (e.g.: number of lines played and cash/credits bet per line);	Compliant	The total bet amount is provided.

ADM Guidelines	System Compliance	Comments
e) Amount of the winning of the last game (including progressive jackpots)	Compliant	The total amount won is provided.
f) Results of any intermediate game phases, such as gambles or bonus games.	N/A	No such phases in the game.
Only with regard to skill games, the details mentioned at point f) do not have to be provided	Acknowledged	
In case the integration of newly certified games in previously certified gaming platforms, produces a change to the 'replay last game' facility, then this facility must be reviewed and re-approved by the ATF before these games can be offered.	Acknowledged	
<b>2.6.7 GAME DISABLE</b>	<b>Out of scope</b>	<b>The licensee operating the ADM-approved platform running this game will be responsible for meeting this requirement.</b>
1. The RGS must provide the licensee with a disable option for each game variation offered, among those approved by AAMS.		
2. When a game variation is disabled, all players playing that game variation must be permitted to conclude their current game in play. Exceptions can be made for multi-state game variations (e.g.: Blackjack, Poker, etc.) that are currently in play, where the player's hit (as defined in the Decree Prot. n. 2011/666/Giochi/GAD) or the game session (only for tournament games) of the player ends in the middle of a hand, or a period of inactivity greater than 30 minutes has elapsed, during which time the licensee must make all reasonable efforts to advise the player that their game must be finished. If a multi-state game variation is disabled in such a manner, the player must be advised that this has occurred the next time they log on to the RGS. In case of disconnection, at the moment of the game reactivation, the player must complete the game only in the case he selects the same game.		
3. Once a game variation is disabled, it must not be accessible to players after their current game has concluded.		
4. The RGS must provide the licensee with full audit trails when disabling a game variation that is currently in play.		
5. The RGS must also provide a disable option for all gaming offered on the RGS to be disabled, as a whole, by the licensee – with full consideration to the associated requirements listed above.		
6. The RGS must also provide the licensee with a disable option for each single active game session, with full consideration to the associated requirements listed above.		
In case the integration of newly certified games in previously certified gaming platforms produces a change to the disable facility, then this facility must be reviewed and re-approved by the ATF before these games can be offered.		
<b>2.6.8 INCOMPLETE GAME PLAYS</b>		
1. During the player's absence, for card games that do not envisage the passive presence at the table (e.g.: scopa, briscola, etc), the player substitution strategy must be predictable and must allow for the completion of the tournament. In order to facilitate the player connection and the game resumption time spent by	N/A	

ADM Guidelines	System Compliance	Comments
the system to carry on an action in absence of the player must be the same as the maximum period allowed to carry on the action in a normal situation.		
2. In case of tournament games with direct interaction, the player that cannot complete a game for one of the following reasons:	N/A	
a) Loss of communications between RGS and end player device,		
b) End player device restart,		
c) Abnormal termination of gambling application on end player device,		
d) must be obliged to continue to participate in the game, if the later has not finished at the time of reconnection.		
3. As regards games of chance with fixed odds and non tournament single player card games, the RGS must provide a mechanism for the player to complete an incomplete game, before the player is permitted to play another game of the same type.	N/A	If the player is disconnected, all bets in progress will be automatically completed and winnings will be paid.
4. Upon reconnection by the player, the RGS must present the player the incomplete game for completion. Incomplete games may be due to:	N/A	
a) Loss of communications between RGS and end player device,		
b) RGS restart,		
c) Game disabled by RGS,		
d) End player device restart,		
e) Abnormal termination of gambling application on end player device,		
f) The momentary interruption of game by a player that has followed an external link to find more information on the game		
5. Tournament games and multistage games that have been disabled by the RGS, may be terminated immediately upon the disable of the game.	N/A	
6. Game phases associated with a partially complete game that can be continued must be held by the RGS until the game completes. Player accounts must reflect any funds held in incomplete games.	Out of scope	The licensee operating the ADM-approved platform running this game will be responsible for meeting this requirement.
7. In Live Dealer games, fixed odds chance games and card games not in single player tournament the player who is not able to finish the current hand for one of the following reasons:	N/A	
a) Interruption of communication between RGS and the device of the player;		
b) Reboot of the device of the end player;		
c) An anomalous termination of the game application on the end player device, the player must be able to continue their participation to the hand, if it has not ended in the meantime, when reconnecting. In this case, inactivity or sit-out for the potential subsequent hands must be provided.		
8. During the player's absence, if it is not possible to sit-out at a table, the passive presence of the player during the current hand must be managed, avoiding the possibility of placing further bets or making other actions with the intent to minimise the consequent money disbursement during the disconnection period (e.g. passing the hand in a poker game after the potential raisings of other players). The game strategy must be clearly described in the game rules.	N/A	



ADM Guidelines	System Compliance	Comments
9. In case the integration of newly certified games in previously certified gaming platforms produces a change to incomplete game play management, then this must be reviewed and re-approved by the ATF before these games can be offered.	Acknowledged	
<b>2.6.9 GAME ARTWORK (DISPLAYED INFORMATION)</b>		
This section refers to all forms of graphical and auditory information that is sent to the end player device for presentation to the player. The combination of all relevant information being presented to the player must Comply with these requirements	Acknowledged	
<b>2.6.9.1 Instructions and Information</b>		
1. All information presented on the gaming platform and games (whether visual or auditory, written or pictorial) must not be in any manner or form indecent, illegal or offensive (e.g.: pornographic or offensive to religion or race).	Compliant	The information provided is not offensive in any manner.
2. All information presented on the games must be available at least in Italian, and must be both grammatically and syntactically correct. A strict translation is not necessary when well known technical terms and borrowed from other languages (e.g.: check, bet, etc...) are used. <i>Note: logos or copyright messages may be displayed. This does not preclude the display of the same information in other languages</i>	Compliant	All game information presented on the website and game screens is available in Italian and is correct.
3. All written information presented on the gaming platform and games must be clearly shown and must not be deceiving to the player.	Compliant	Information provided on the games is clearly readable and not deceiving to the player.
4. All written information presented on the gaming platform and games must be truthful.	Compliant	The information provided on the games is true.
5. All game help / rules information must be clearly visible, or the means of displaying such information must be readily available, at all times.	Compliant	
6. All game help / rules information must be visible / available to the player even in absence of punts/bets/purchase of game cards	Compliant	
7. All game help / rules information must be easily interpretable, non-ambiguous, and sufficient to explain all game rules.	Compliant	The game instructions are sufficient to explain the game rules.
8. There must be sufficient game help / rules information to allow a player to determine the correctness of prizes awarded.	Compliant	The game rules are sufficient to allow the player to determine the correctness of the prizes awarded.
9. If random prizes are offered, the maximum value obtainable from the random prize must be indicated in the game help/rules information.	N/A	
10. If the value of the random prize depends on the amount of punts/bets/purchase of game cards, this must also be stated in the game help/rules information.	N/A	
11. The name of the game being played must be clearly visible to the player on the game screen.	Compliant	The game name is clearly visible to the player on the game screen.
12. As regards games of chance with fixed odds and non tournament card games, the payable displayed in the game artwork must correspond to the payable used in the mathematical treatise as well as to the payable implemented in the game software.	Compliant	The information is provided in the game rules.
13. The functions of all buttons represented on the website and games must be clearly indicated, preferably on the button.	Compliant	

ADM Guidelines	System Compliance	Comments
14. [For each game of the platform the theoretical RTP and the RTP detected during the running related to the previous month must be clearly visible and easily accessible.] <sup>ACC</sup>	Out of scope	Final verification will be necessary on the licensee platform.
15. In the event, also due to the integration of new certified games in game platforms previously certified, the display of the detailed information of this paragraph 2.6.9.1 are available in different instances on the gaming platform, these information must be reviewed and re approved by the ATF before these games can be offered	Acknowledged	
<b>2.6.9.2 [Bet display]</b> <sup>ACC</sup>		
1. The bet denomination (and where applicable the tokenisation) of the game must be clearly visible on the game screen, or be able to be easily deduced.	N/A	
2. Where the game uses game credits, the number of credits registered for each monetary unit for the current game must be displayed on the game screen.	N/A	
3. The artwork must either state the maximum bet and, with reference to reel games, the number of credits that can be bet per line and the number of possible lines available, or it must be possible to deduce this information from the game help / rules	Compliant	The maximum bet is displayed.
4. The minimum bet (if not easily deduced) must be readily available to the player, either directly on the game screen or in the game help / rules information.	Compliant	The minimum bet is displayed.
<b>2.6.9.3 [Result display]</b> <sup>ACC</sup>		
1. The display of the game outcome must not be misleading or deceptive to the player (e.g.: it must not inappropriately indicate a near-miss, as per paragraph 2.6.1 “Game Fairness”).	Compliant	The game results are displayed clearly.
2. The outcome of each game must be displayed for a reasonable length of time.	Compliant	The game results are displayed for a reasonable length of time and the player can see and understand the results.
3. The nature of all prizes must be clearly indicated. If some prizes are in cash, and/or in other credits, this must be stated.	Compliant	The nature of all prizes is clearly indicated.
4. If the game artwork contains instructions specifying a maximum win, then it must be possible to win this amount from a single game (including bonus or other game options). For example, if the artwork states that the maximum prize for a game is €2.000,00, it must be possible to win said sum in a game play.	N/A	
5. To the extent that is practicable for the range of games offered, only one method of displaying win amounts should be used on the gaming platform so as to avoid confusion.	N/A	
<b>2.6.9.4 [Multi-player games]</b> <sup>ACC</sup>	N/A	<b>The game is not multi-player games</b>
1. Multi-player games (e.g.: Poker) with outcomes that can be affected through an external exchange of information between different players (e.g.: a telephone conversation) will not be permitted unless clear rules compensating controls or technology is put in place to ensure the appropriate management and that the prospect of cheating is addressed and minimised, complying with the minimum requirements detailed in these guidelines in relation to anti-collusion, anti-fraud and anti-money laundering.		
2. Multi-player games with outcomes that can be affected through the use of automated end player devices or ancillary computer systems (e.g.: chess)		

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must have warnings in the game rules so that players can make an informed decision whether or not to participate.		
3. RGS must ensure player fairness, to the extent possible, in the event of a communication loss to one or more end player devices during a multi-player game.		
4. Game rules must cater for situations where the RGS loses connectivity with the player. The consequences must be explained to the player.		
<b>2.6.9.5 SPECIFIC REQUIREMENTS PER GAME</b>		
The appendices of these Guidelines detail any requirements that are specific for each type of game or game feature. It should be noted that a game or game feature need only comply with the requirements applicable to that particular type of game or game feature.	Acknowledged	
<b>2.6.10 LIMITS FOR GAMING SESSION (AS PER THE DECREE SPECIFICATIONS)</b>		
For skill and card games in tournament mode the right of participation, also inclusive of potential buy backs, cannot exceed EUR 250,00 (two hundred and fifty/00). This limit is to be considered related to the entrance right fee and potential buy backs occurred from the request for the participation right until the end of its validity.	N/A	
For skill games with fixed odds not in tournament mode the participation fee, potentially comprehensive of subsequent buy backs, cannot exceed EUR 1.000,00 (one thousand/00). This limit is to be considered related to the entrance right fee and potential buy backs occurred from the request for the participation right until the end of its validity.	N/A	
For the game of Bingo the price of the single cards for each game cannot be higher for € 10.00.] BNG In the event that, even following the integration of new certified games in previously certified gaming platforms, the calculation mechanism and application of the aforementioned limits undergoes a change, then this mechanism must be verified again by the ODV and approved by ADM first. that such games may be offered.	Acknowledged	
<b>2.6.11 SPECIFIC REQUIREMENTS FOR “MOBILE” GAMES</b>		
A mobile game is seen as any game accessible only on mobile devices, generally with a screen less than 7” (i.e.: specific applications for smart phone devices or equivalents) or using a multiplatform web technology created and optimized exclusively for mobile devices use. In mobile games it is reasonable that on the screen where the game is carried out links to pages for a responsible game and to game rules are not available. If there are no links to pages for responsible gambling and to game rules, those have to be available and clearly visible on the pages immediately preceding the game pages. A game without a link to pages for a responsible game and to the game rules on the pages where the game activity is carried out must be necessarily and exclusively accessible through a mobile device.	Compliant	The game can be accessible on mobile devices.
<b>2.6.12 INFORMATION ON SINGLE BETS</b>		
For each game used, the RGS will have to store and	Out of scope	The licensee operating the



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create back-up copies for all the following information, in addition these must be available to be recalled on demand through proper functionalities or procedures:		ADM-approved platform running this game will be responsible for meeting this requirement.
a) unique identification of the player;		
b) unique identification of the bet; in case of ability or card games organized as a tournament the bet is considered as the action of participation to the same tournament;		
c) time of start of the game according to RGS;		
d) amount of the bet;		
e) Any contribution to progressive jackpot;		
f) Updated state of the game (in progress/ended) (Note: RGS will have to store all the games not ended and the reason for the non-completion);		
g) Game outcome;		
h) Any winnings of the progressive jackpot;		
i) Time of game conclusion according to RGS;		
j) Amount won.		
The RGS must maintain and make back-up copies of a list of all games hosted by the gaming platform, including approved versions of the games / pay tables / payouts; this information must be available upon request for a period of time established by the licensee.		
In the event that following the integration of new certified games in previously certified gaming platforms, the list of games hosted by the gaming platform undergoes a change, then this requirement must be verified again by the ODV and approved by ADM before such games can be offered.		
<b>2.6.13 INFORMATION ON SIGNIFICANT EVENTS</b>		
For significant events, the RGS must maintain and back up all the changes made by the licensee to game parameters and be capable of reporting this information upon request, through an automatic function:	Acknowledged	
a) Changes made by the licensee to game parameters	Out of scope	The licensee operating the ADM-approved platform running this game will be responsible for meeting this requirement.
b) Changes made by the licensee to progressive jackpot parameters;	N/A	
c) Creation of a new progressive jackpot;	N/A	
d) Progressive jackpot wins;	N/A	
e) Progressive jackpot shutdown.	N/A	
External computer systems (e.g.: Jackpot controller) that affect game outcome or win amounts must maintain a log of date and time stamped on significant events, if they are not immediately transferred to the RGS.	N/A	No external computer systems are involved in determining the game outcome or win amounts.
The RGS must be able to receive and store all significant events from external computer systems that affect game outcome or win amounts.	N/A	No external computer systems are involved in determining the game outcome or win amounts.
The RGS must provide a means to view significant events from external computer systems that affect game outcome or win amounts, including the ability to search for particular event types.	N/A	No external computer systems are involved in determining the game outcome or win amounts.
In the event that following the integration of new certified games in previously certified gaming platforms, the memorization mechanism of the changes made by the concessionaire to the game	Acknowledged	

ADM Guidelines	System Compliance	Comments
parameters is changed, then this mechanism must be verified again by the ODV and approved by ADM before such games can be offered.] ACC, BNG		
<b>APPENDIX A: REQUIREMENTS FOR PROGRESSIVE JACKPOT GAMES</b>	N/A	The game is not linked with the jackpot
<b>APPENDIX B: GAMBLE OPTION REQUIREMENTS</b>	N/A	The game does not offer a gamble feature.
<b>APPENDIX C: SLOT GAMES WITH REELS</b>	N/A	This game is not a slot-type game
<b>APPENDIX E: DICE GAMES REQUIREMENTS</b>	N/A	
<b>APPENDIX F: GENERAL CARD GAMES REQUIREMENTS</b>	N/A	
<b>APPENDIX G: SINGLE-PLAYER POKER REQUIREMENTS</b>	N/A	
<b>APPENDIX H: MULTI-PLAYER POKER REQUIREMENTS</b>	N/A	
<b>APPENDIX I: BLACKJACK REQUIREMENTS</b>	N/A	
<b>APPENDIX J: LIVE DEALER GAMES</b>	N/A	
<b>APPENDIX K: OTHER GAMES</b>		
This section focuses on games that do not fall into the above categories:	Acknowledged	
1. initial player selection options should be described.	Compliant	
2. Player selection options should be clearly displayed on the screen after starting the game.	Compliant	
3. The amount of winnings for each bet and the total winnings should be displayed on the screen.	Compliant	
<b>APPENDIX L: PURE SKILL GAMES</b>	N/A	
<b>APPENDIX M: BETTING EXCHANGE</b>	N/A	
<b>APPENDIX N: BINGO GAME REQUIREMENTS</b>	N/A	

## 7. Declaration of Compliance

ga has verified through source code review, functionality testing, emulation, and calculation of return to player that the game(s), listed in section 4.1 Test Summary, comply with ADM requirements.

ga recommends that the game(s), listed in section 4.1 Test Summary, to be approved for use in ADM approved gaming platforms.



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