



Certification Report.	Pragmatic Play Game Audit Report – Spaceman Game
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Report prepared for	Pragmatic Play Ltd Block E, Falcon House, Main Street, Sliema – SLM 1544 Malta
Jurisdiction	Alcohol and Gaming Commission of Ontario (AGCO), Ontario, Canada
Technical Standard used for testing	Registrar's Standards for Internet Gaming

Gaming Associates

Notation

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 author’s written permission. 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 copyrighted.

1.2 Disclaimer

ga has reported on what was discovered throughout the assessment period of the client’s games 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 application 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.

Administration

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1.4 Version

Version	Description	Date
V0.1	Initial draft – MHAS	2022-06-10
V0.2	Reviewed and Updated – WKAS	2022-06-13
V0.3	QA – UVAS	2022-06-14
V1.0	Final report – Pragmatic Play	2022-06-16

Executive Summary

1.5 Introduction

Pragmatic Play Ltd (Pragmatic Play) has requested Gaming Associates (**ga**) to test their Spaceman game enlisted in section 3.4 of this report against the standards of the Alcohol and Gaming Commission of Ontario (hereinafter “AGCO”).

This report presents the results of testing performed by **ga** for the Spaceman game against the AGCO Standards.

1.6 Scope of Testing

The games were tested against the game related requirements of the following standards:

- ♠ Registrar’s Standards for Internet Gaming

RNG is not in the scope of this evaluation and certified separately. Games are not linked with progressive Jackpot System. Checksum of critical components of the games were collected and mentioned in *Annex: A Hashes of Critical Components*

1.7 Testing Environment

The testing of games was conducted in a test environment supplied by Pragmatic Play Ltd hosted at: <https://emul-gp1.pragmaticplay.net/cgAPIttest/v3/game/game>

1.8 Test Summary

S.NO	Game Name	Game Type	Channels	Version	%RTP
1.	Spaceman	Other Game	Desktop and Mobile	1.60.22	95.50%

1.9 Conclusions and Recommendations

Subject to the scope of testing and on the basis of testing performed by **ga** for Pragmatic Play Ltd on the provided games, has formed an opinion that the submitted games comply with the applicable technical standards of the jurisdiction of Ontario, Canada as regulated by the Alcohol and Gaming Commission of Ontario.

Test Results

This section summarises the results of the tests performed on the games provided. The tables in the following sub-sections provide the assessment of compliance status of the game against the applicable technical standards of the AGCO.

The different values used in the tables below within the “Compliance Status” column are described as follows:

Compliant: The testing results comply with the requirement.

Acknowledged: The requirement is only a statement or information.

N/A: The requirement is not applicable for the current product testing.

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

1.1 Registrar's Standards for Internet Gaming

No.	AGCO Requirements	Compliance Status	Comments
1	Entity Level		
	Management Integrity	Out of scope	Evaluation of game management / operational procedures and controls is out of scope.
*1.01	There shall be a commitment to character, integrity and high ethical values demonstrated through attitude and actions.		
	1. All applicable laws and regulations shall be adhered to.		
	2. Matters identified in management letters from internal and external auditors and matters identified by the Registrar shall be responded to in a timely manner.		
	3. Operators and gaming-related suppliers shall create and abide by a code of conduct which addresses, at a minimum, conflicts of interest and transparency in dealings with the Registrar. Operators and gaming-related suppliers will be responsible for employee compliance with the code, where such employees play games provided by the Operator or supplier. The code of conduct must be regularly reviewed by the organization's senior management. Guidance: Management in the context of this Standard refers to executives and senior-level management who have the day-to-day responsibility of managing the business of the organization.		
	Sound Control Environment	Out of scope	Evaluation of game management / operational procedures and controls is out of scope.
*1.02	Operators shall submit formal control activities related to the gaming platform, including where the Operator works with a third-party platform provider, to the Registrar. Control activities		

No.	AGCO Requirements	Compliance Status	Comments
	must be assessed by an independent oversight function acceptable to the Registrar for alignment with the Standards and Requirements and authorized by the appropriate level of management.		
	1. A process shall be in place to periodically review control activities for effectiveness in meeting the Standards and Requirements and to document, remedy and adjust the controls where deficiencies or gaps are found.		
	2. Substantial changes to the control environment shall be communicated to the Registrar in a timely manner.		
	3. Control activities must be available to the AGCO (or its designate) for regulatory assurance purposes. Guidance: Independent oversight may be exercised by an internal audit body and/or external auditor, as considered appropriate by the Operator and as acceptable to the Registrar. The Registrar recognizes that oversight practices may vary by Operator depending on their size, ownership structure, scope and complexity of operations, corporate strategy and risk profile. Whatever the case, the independent oversight function should be responsible for auditing the organization's compliance management framework, identifying, managing and reporting on risks the organization is or might be exposed to and exercising oversight that is independent from operational management. It should also have direct and unrestricted access to the Board.		
*1.03	Management overrides of the control activities shall be clearly documented and made available to the Registrar upon request.		
	1. Approval from at least two senior-level managers is required in order to override any control activity, and in each instance the override shall be reported to the Board or other governance structure where a Board does not exist. Guidance: The intent of this Standard is to allow senior-level management to override controls on a one-off basis in necessary circumstances and to ensure that appropriate documentation is maintained for auditing purposes. This Standard is not intended to address permanent changes to the control environment.		
1.04	Operators must establish, implement and maintain controls to support preparation of financial reports which comply with all applicable accounting standards, rules, and good practices.		
	Organizational Structure and Capabilities	Out of scope	Evaluation of game management / operational procedures and controls is out of scope.
*1.05	A personnel security screening process shall be in place for any director or officer, and any employee, agent or consultant, at a		

No.	AGCO Requirements	Compliance Status	Comments
	level that is appropriate for the individual's role in the organization.		
*1.06	Employees must have the competence, skills, experience and training required to execute control activities that are relevant to their responsibilities		
	1. Employees involved in performing control activities must be trained and have knowledge of the organization's control environment, the regulatory risks that the controls are designed to mitigate, and the regulatory objectives reflected in the Standards and Requirements.		
*1.07	Organizational structures shall be designed to promote a sound control environment and proper segregation of duties to ensure that the possibility for collusion or unauthorized or illegal activities is minimized.		
	1. Employees shall be given the appropriate and documented authority and responsibility to carry out their job functions, subject to supervision.		
	2. The adequacy of segregation of duties as they relate to player protection, game integrity and protection of assets shall be regularly reviewed by the organization's internal audit group or other independent oversight function acceptable to the Registrar.		
	3. Operators must maintain an up-to-date organizational chart showing key reporting lines and relationships, and make it available to the Registrar upon request.		
*1.08	Management clearly understands its accountability and authority for the control environment: 1. Management shall have been trained and have knowledge of the organization's control environment, the regulatory risks that the controls are designed to mitigate, and the regulatory objectives reflected in the Standards and Requirements.		
*1.09	Information, including logs, related to compliance with the law, the Standards and Requirements and/or adherence with control activities shall be retained for a minimum of three (3) years, unless otherwise stated.		
	Oversight	Out of scope	Evaluation of game management / operational procedures and controls is out of scope.
*1.10	Compliance with the Standards and Requirements shall be documented in an organized manner to ensure that the information is capable of being reviewed and audited by an independent oversight function		

No.	AGCO Requirements	Compliance Status	Comments
	1. Documentation shall be reviewed and analyzed to ensure compliance with the Standards and Requirements and approved by management.		
	2. Internal and external auditors shall be granted access to all relevant systems, documentation (including control activities), and resources for the purpose of conducting an audit.		
	3. Where directed, Operators and gaming-related suppliers shall retain an independent auditor acceptable to the Registrar to carry out audits required by the Registrar and provide copies of the audit reports to the Registrar. Guidance: The intent of this Requirement is to allow the Registrar to direct third party audits where considered necessary for regulatory assurance purposes. Although the auditor would be retained by the Operator or gaming-related supplier in these circumstances, it would report directly to the Registrar.		
	4. In reviewing control activities for compliance with the Standards and Requirements, internal and external auditors shall take into account the Registrar's expectations, as articulated herein.		
*1.11	Primary accountability for compliance resides with the Board, or other governance structure, where a Board does not exist, and there shall be evidence that the Board, or other governance structure, has carried out its responsibility in this respect.		
	1. A compliance oversight function shall be established that is independent of the activities it oversees. Guidance: Overall responsibility for compliance monitoring should ideally rest with a chief compliance officer or if such person does not exist, a member of senior management.		
	2. An internal audit function shall be established that regularly audits the organization's control environment and compliance management framework and exercises oversight that is independent from operational management. The internal audit function shall have the authority to independently review any aspect of the operations. Guidance: Where this is not feasible given the organization's size or structure, audits should be carried out by another independent oversight function.		
	3. The compliance oversight function and internal audit or other independent oversight function shall have direct and unrestricted access to the Board, or other governance structure, and shall report on all important issues regarding compliance on a regular basis or as necessary.		
	4. The Board, or other governance structure, shall establish a committee or committees to oversee the organization's		

No.	AGCO Requirements	Compliance Status	Comments
	compliance and audit oversight functions, with appropriate terms of reference addressing composition and accountabilities.		
	5. Members of the Board, or other governance structure, and of any committees established to oversee the organization's compliance and audit oversight functions shall understand the business's operations, initiatives and major transactions, and shall have the skills, training, experience and independence to carry out their fiduciary responsibilities.		
*1.12	There shall be an independent "whistleblowing" process to allow employees to anonymously report deficiencies or gaps in the control environment as well as incidents of possible non-compliance with the controls, Standards, and Requirements, or the law		
	1. Operator shall ensure issues raised through the "whistleblowing" process are addressed and communicated to the Board in a timely manner		
*1.13	Registrants shall engage with the Registrar in a transparent way.		
	1. Provide reports regarding any incident or matter that may affect the integrity or public confidence in gaming, including any actions taken to prevent similar incidents from occurring in the future, in accordance with the established notification matrix.		
	2. Provide reports regarding any incident of non-compliance with the law, Standards and Requirements or control activities, including any actions taken to correct the cause of non-compliance, in accordance with the established notification matrix.		
	3. Provide periodic reports demonstrating the performance over time of compliance with control activities.		
	4. Make available any data, information and documents requested by the Registrar.		
	5. Provide reports regarding any public complaints related to compliance with the Standards and Requirements, including any actions taken to resolve the complaints, in accordance with the established notification matrix.		
1.14	The Operator shall ensure that investigators (OPP or Registrar) are able to monitor and participate in games.		
	Customer Service	Out of scope	Evaluation of game management / operational procedures and controls is out of scope.

No.	AGCO Requirements	Compliance Status	Comments
1.15	A mechanism shall be in place to allow players to contact the Operator in a timely fashion with issues and complaints relating to their player account, funds management, gameplay, or any matter related to compliance with the Standards and Requirements. The Registrar shall be notified of any such issues or complaints, in accordance with the established notification matrix.		
1.16	Player complaints, disputes, and inquiries must be recorded and addressed in a timely, fair, transparent, and appropriate manner.		
	1. Operators must have clear service standards and must make these available to players.		
	2. Disputes must be resolved under Ontario and Canadian law		
1.17	Relevant information about the AGCO shall be displayed and easily accessible to the player.		
	Third-Party Management	Out of scope	Evaluation of game management / operational procedures and controls is out of scope.
*1.18	Operators and gaming-related suppliers shall only contract with reputable suppliers.		
1.19	Operators are responsible for the actions of third parties with whom they contract for the provision of any aspect of the Operator's business related to gaming in Ontario and must require the third party to conduct themselves in so far as they carry out activities on behalf of the operator as if they were bound by the same laws, regulations, and standards.		
*1.20	Operators and gaming-related suppliers shall maintain a list of suppliers that provide them with goods or services in relation to lottery schemes and shall make it available to the Registrar upon request.		
1.21	Operators must ensure that no independent third parties that engage in direct-to-consumer marketing, direct-to-consumer promotion, or player referral services for the Operator under contract, in exchange for commissions, or for any other form of compensation also undertake such activities related to online gaming sites that facilitate or accept wagers from players in Ontario without an AGCO registration. Guidance: This Standard covers the activities of those entities that Operators and others in the gaming industry commonly refer to as "affiliates" or "marketing affiliates", which are often paid or otherwise compensated to refer to customers to another business' products, services, or websites through direct-to-consumer marketing services. This commonly understood term used among gaming registrants and other entities involved in		

No.	AGCO Requirements	Compliance Status	Comments
	gaming and known as “affiliates” or “marketing affiliates”, is used here for guidance purposes only, and is distinct from how that term may be used in any other regulatory scheme.		
2	Responsible Gambling		
	Policies and Culture	Out of scope	Pragmatic Play Ltd supplies games. This requirement is the operator's responsibility.
2.01	Operators shall implement and follow policies and procedures that will identify, prevent and minimize the risks of harm from gaming to players. These policies and procedures shall be reviewed and evaluated regularly for effectiveness to ensure that they follow industry best practices and that the stated objectives of the policies and procedures are achieved. All staff, including senior management staff, shall be trained on the content and application of the policies and procedures at the time they are retained by the Operator and at regular intervals after.		
	1.Policies and procedures for responsible gambling must be integrated into the control activities, forming a part of the control activities.		
	2. Training for managers and staff on responsible gambling policies and procedures should be in addition to any training on the control activities. These training programs should be regularly evaluated to include current best practice research and employee feedback.		
	3. As part of regular review of responsible gambling policies and procedures to ensure that they meet industry best practices, Operators and the provincial agencies shall consult with stakeholders, including players and responsible gambling practitioners and researchers, to assess, improve and address the harms associated with gaming.		
	4. As part of the regular review of responsible gambling policies and procedures, staff understanding of the policies and procedures, the fundamental concepts of responsible gambling and problem gambling, and the impact of their job duties on player protection shall be assessed. Any gaps identified must be addressed.		
2.02	The OLG and iGaming Ontario shall implement and follow policies and procedures to ensure that their activities facilitate and support the identification, prevention, and minimization of the risks of harm of gaming to players.		
	1. Policies and procedures for responsible gambling must be integrated into the control activities, forming a part of the		

No.	AGCO Requirements	Compliance Status	Comments
	control activities. Registrar's Standards for Internet Gaming For ITL review in advance of publication July 2021 14*= also applicable to GRS		
	2. Training for managers and staff on responsible gambling policies and procedures should be in addition to any training on the control activities. These training programs should be regularly evaluated to include current best practice research and employee feedback.		
	Marketing and Advertising	Out of scope	Pragmatic Play Ltd supplies games. This requirement is the operator's responsibility.
2.03	Advertising, marketing materials, and communications shall not target high-risk, underage, or self-excluded persons to participate in lottery schemes, shall not include underage individuals, and shall not knowingly be communicated or sent to high-risk players		
	1. Be based on themes, or use language, intended to appeal primarily to minors.		
	2. Appear on billboards or other outdoor displays that are directly adjacent to schools or other primarily youth-oriented locations.		
	3. Contain cartoon figures, symbols, role models, and/or celebrity/entertainer endorsers whose primary appeal is to minors.		
	4. Use individuals who are, or appear to be, minors to promote gaming.		
	5. Appear in media and venues, including on websites, and in digital or online media, directed primarily to minors, or where most of the audience is reasonably expected to be minors.		
	6. Exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of all potentially high-risk persons, or otherwise extoll the virtues of gaming.		
	7. Entice or attract potentially high-risk players. Instead, precautions shall be in place to limit marketing communications to all known high-risk players. Guidance: Where cartoons are used, they may not primarily appeal to minors.		
2.04	Marketing, including advertising and promotions, shall not mislead players or misrepresent products.		
	1. Imply that playing a lottery scheme is required in order to fulfill family or social obligations or solve personal problems.		

No.	AGCO Requirements	Compliance Status	Comments
	2. Promote playing a lottery scheme as an alternative to employment, as a financial investment, or as a requirement for financial security		
	3. Contain endorsements by well-known personalities that suggest that playing lottery schemes has contributed to their success.		
	4. Encourage play as a means of recovering past gaming or other financial losses.		
	5. Be designed so as to make false promises or present winning as the probable outcome.		
	6. Imply that chances of winning increase:		
	a. The longer one plays;		
	b. The more one spends; or		
	c. Suggest that skill can influence the outcome (for games where skill is not a factor);		
	7. Portray, suggest, condone or encourage gaming behaviour that is socially irresponsible or could lead to financial, social or emotional harm.		
	8. Suggest that gaming can provide an escape from personal or professional problems.		
	9. Portray gaming as indispensable or as taking priority in life; for example, over family, friends or professional or educational commitments,		
	10. Suggest that gaming can enhance personal qualities, for example, that it can improve self image or self-esteem, or is a way to gain control, superiority, recognition or admiration,		
	11. Suggest peer pressure to gamble nor disparage abstention,		
	12. Link gaming to seduction, sexual success or enhanced attractiveness,		
	13. Portray gaming in a context of toughness or link it to resilience or irresponsible play, or		
	14. Suggest gaming is a rite of passage		
2.05	Advertising and marketing materials that communicate gambling inducements, bonuses and credits are prohibited, except on an operator's website.		

No.	AGCO Requirements	Compliance Status	Comments
	Guidance: This standard does not prohibit the use of inducements, bonuses and credits.		
2.06	Advertising and marketing materials that communicate gambling inducements, bonuses and credits must disclose all conditions and limitations of the offer at its first presentation on the website.		
2.07	Players must be provided an opt-in process whereby they actively consent to receiving any direct advertising and marketing of inducements, bonuses and credits, and must be provided a method to withdraw their consent at any time.		
	Supporting Informed Decision Making	Out of scope	Pragmatic Play Ltd supplies games. This requirement is the operator's responsibility.
2.08	A systematic approach is used to support, integrate, and disseminate information to enable players to make informed decisions and encourage safer play. 1. Responsible gambling materials and information about obtaining help shall be available, visible and accessible to all players. Responsible gaming material should include information about:		
	a. How games work and about common misconceptions,		
	b. Lower risk gaming behaviors including how responsible gambling tools work,		
	c. Gaming harms, and		
	d. The variety of support services available to players, including information and support services available to players that may provide specialized information (e.g., self-assessment, and play management tools		
	2. Information about financial and time-based gaming limits shall be made available to all players.		
	3. Information about self-exclusion programs shall be available, visible and accessible to all players.		
	4. Advertising and marketing materials shall contain a responsible gambling message.		
	5. All information related to responsible gambling shall be regularly and periodically reviewed and updated to ensure that it is accurate, up to date and in line with industry good practice.		
	6. Operators will periodically measure whether players are aware of the information provided and whether they considered		

No.	AGCO Requirements	Compliance Status	Comments
	the information to be readily available. Any gaps must be addressed.		
2.09	<p>The registration page and pages within the player account shall prominently display a responsible gambling statement, the online link, as well as the number for Connex Ontario, and provide a link to a page that provides responsible gambling materials, information, resources and support for people experiencing problems with gaming.</p> <p>Guidance: The referral to the page that provides responsible gambling materials and information about obtaining help in Ontario may be a page maintained by the Operator or a third party.</p>		
	Identifying and Assisting Individuals Who May Be Experiencing Harm	Out of scope	Pragmatic Play Ltd supplies games. This requirement is the operator's responsibility.
2.10*	<p>A mechanism shall be in place to monitor player risk profiles and behaviors for the purpose of detecting signs of players potentially experiencing harm.</p> <p>1. Operators shall include a risk profile for players at high risk of experiencing gambling-related harm.</p>		
2.11	Assistance for players who may be experiencing harm from gaming is readily available and systematically provided.		
	1. All employees who interact with players shall be knowledgeable about a variety of help resources and are able to provide that information upon request from players or affected others.		
	2. Players shall be provided with easily accessible contact information of at least one organization in Ontario, dedicated to treating and assisting people experiencing harm from gaming.		
	3. Operators shall develop and implement responsible gambling policies, procedures and training to assess, detect and address situations where players may be experiencing harm. In these cases, operators shall implement interventions that are tailored to the severity of the situations in which players may be experiencing harm.		
	4. Responsible gambling policies shall be reviewed periodically for effectiveness.		
	5. Live customer support shall be made available 24/7.		
	Employee Training	Out of scope	Pragmatic Play Ltd supplies games to operators. This requirement is the operator's responsibility.

No.	AGCO Requirements	Compliance Status	Comments
2.12	Employees shall understand the importance of responsible gambling and how their jobs impact player protection as well as the fundamental concepts of responsible gambling and problem gambling.		
	1. All employees shall receive mandatory training which is refreshed regularly, to include current best practice research and employee feedback		
	2. All employees who interact with players shall receive training in a program designed to identify and respond appropriately to players who may be showing signs of problem gambling and to assist players who may be experiencing harm from gaming.		
	3. Training for managers and staff for responsible gambling policies and procedures should be in addition to any training on the control activities. These training programs should be regularly evaluated to include current best practice research and employee feedback.		
	4. Employees shall understand the operator's commitment to responsible gambling and how it is integrated throughout operations.		
	5. Employees shall understand the harms associated with gaming as well as essential prevention and mitigation concepts.		
	Self-Exclusion and Breaks in Play	Out of scope	Pragmatic Play Ltd supplies games to operators. This requirement is the operator's responsibility.
*2.13	Individuals shall have the option to take a break in play, in addition to a formal self-exclusion program		
	1. Users shall have the option to initiate a short-term break in their play.		
	2. Operators shall provide the option to take a one day, one week, one month, two months, or three-month break.		
	3. Once an individual initiates a break, they shall be unable to place further wagers during the time period of the break.		
2.14	Operators shall provide a voluntary self-exclusion program for their site. 1. Operators' self-exclusion programs shall be well promoted and easily accessible.		
	2. The self-exclusion registration process shall be efficient and support-oriented and shall include the provision of resources and information about where to get help.		

No.	AGCO Requirements	Compliance Status	Comments
	3. The terms and conditions of the self-exclusion program shall be clearly worded, including: the player's obligations under the agreement, the consequences of self-exclusion, and the process for returning to play safely.		
	4. Clearly defined term lengths that must include options must include options for terms lasting six months, one year and five years.		
	5. Once an individual self-excludes, they shall be immediately logged out of their account and unable to login in for the duration of their exclusion.		
	6. Operators must, as soon as is practicable, take all reasonable steps to prevent any marketing material, incentives or promotions from being sent to the self-excluded individual for the duration of the self-exclusion period.		
	7. Operators shall cancel all future game transactions for self-excluded individuals.		
	8. Operators must maintain a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the registrant)		
	9. Operators shall take active steps to identify, and if required, remove self-excluded persons from the gaming site when they are found to be in breach of their self-exclusion agreement. Note: Once directed by the Registrar, Operators will be required to participate in a coordinated, centralized self-exclusion program, that shall be in place to allow players to automatically exclude themselves from all online Operator platforms, including OLG.		
	Game Design and Features		
*2.15	Game designs and features shall be clear and shall not mislead the player.	Acknowledged	
	1.Game design shall not give the player the perception that speed of play or skill affects the outcome of the game when it does not.	Compliant	
	2. After the selection of game outcome, the game shall not make a variable secondary decision which affects the result shown to the player. If the outcome is chosen that the game will lose, then the game shall not substitute a particular type of loss to show to the player (i.e. near miss).	Compliant	The game does not display near-miss results.
	3. Where the game requires a pre-determined pattern (for example, hidden prizes on a map), the locations of the winning	N/A	There is no pre-determined layout of the game results.

No.	AGCO Requirements	Compliance Status	Comments
	spots shall not change during play, except as provided for in the terms governing play.		
	4. Games shall not display amounts or symbols that are unachievable.	Compliant	
	5. Free-to-play games available through the gaming site or related websites shall not misrepresent or mislead players as to the likelihood of winning or prize distribution of similar games and shall have the same odds of winning as games played for money.	N/A	Only the play-for-money game has been tested.
	6. The denomination of each credit shall be clearly displayed on game screens.	N/A	
*2.16	Game designs and features shall help to prevent extended, continuous, and impulsive play and facilitate low risk play behaviours.	Acknowledged	
	1. Games shall not encourage players to chase their losses, or increase the amount they have decided to gamble, or continue to gamble after they have indicated that they want to stop.	Compliant	The game is not unfair or misleading.
	2. Games shall not provide auto-play features for slots.	N/A	
	3. Game play shall be initiated only after the player has placed a wager and activated play. No player shall be forced into game play by selecting the game for review or reviewing information about how the game is played or how bets are made.	Compliant	The customers are not forced to play the game by just selecting that game.
	4. A player should commit to each game individually, releasing and then depressing the 'start button' or taking equivalent action. Continued contact with a button, key or screen should not initiate a new game	Compliant	All selections are made by the Player to start each game round individually.
*2.17	The gaming system must not offer functionality which facilitates playing multiple slots games at the same time. This includes, but is not limited to, split screen or multi-screen functionality. Combining multiple slots titles in a way which facilitates simultaneous play is not permitted.	N/A	
*2.18	It must be a minimum of 2.5 seconds from the time a game is started until the next game cycle can be commenced. It must always be necessary to release and then depress the 'start button' or take equivalent action to commence a game cycle. A game cycle starts when a player depresses the 'start button' or takes equivalent action to initiate the game and ends when all money or money's worth staked or won during the game has been either lost or delivered to, or made available for collection by the player and the start button or equivalent becomes available to initiate the next game. A player should commit to each game cycle individually,	N/A	

No.	AGCO Requirements	Compliance Status	Comments
	continued contact with a button, key or screen should not initiate a new game cycle.		
*2.19	For slots games, the gaming system must not permit a customer to reduce the time until the result is presented. Features such as turbo, quick spin and slam stop are not permitted. This is not intended to be an exhaustive list but to illustrate the types of features the requirement is referring to. Note: This Standard does not apply to bonus/feature games where an additional stake is not wagered.	N/A	
*2.20	The gaming system must not use auditory or visual effects that are associated with a win for returns which are less than or equal to last total amount wagered	Compliant	No celebration and winning sound on winnings lesser than the bet amount are available in the game.
*2.21	All gaming sessions must clearly display a customer's net position (the total of all winnings minus the sum of all losses since the start of the session), in Canadian dollars	Compliant	The customer's net position in Canadian dollars is displayed.
*2.22	Players shall have the means to track the passage of time.	Compliant	A clock or timer is displayed on the bet screen.
	Limit Setting Features	Out of scope	Pragmatic Play Ltd supplies games. This requirement is the operator's responsibility.
*2.23	Players shall be provided with an easy and obvious way to set gaming limits (financial and time-based) upon registration and at any time after registration.		
	1. Players shall be provided with the option to set loss and deposit limits during registration.		
	2. Operators must offer players the options of setting limits on any number of the following:		
	a. Deposit limits, where the amount a player deposits into their account is limited over a period of time chosen by the player,		
	b. Spend limits, where the amount a player spends on betting or betting on particular lottery schemes, or both, are restricted and		
	c. Loss limits, where the amount lost (i.e., winnings subtracted from the amount spent) is restricted.		
	3. The period or duration of the financial or time-based limits offered must include, 24 hours, 7 days and one month. Where the player sets simultaneous periods (e.g., a deposit limit for a day and for a week), the lowest limit must apply.		

No.	AGCO Requirements	Compliance Status	Comments
	4. Financial and time limit functions must be easy to find, reach and initiate or change at any time after the player has registered and opened an account.		
*2.24	Where a gaming limit has been previously established by a player, a request by the player to relax or eliminate that limit shall only be implemented after a cooling-off period of at least 24 hours.		
	1. The Operator must not relax or eliminate a gaming limit without a request from the player and only after the expiry of the cooling-off period.		
	2. Gaming limits must be enforced by the gaming system.		
3	Prohibiting Access to Designated Groups and Player Account Management	Out of scope	Pragmatic Play Ltd supplies games. This requirement is the operator's responsibility.
	Eligibility		
3.01	Only eligible individuals are permitted to create a player account, and only individuals who hold a valid player account are permitted to log on to their account and gamble. 1. The following individuals are not eligible to play games on a gaming site:		
	a. An individual under 19 years of age except where the individual is at least 18 years of age and is accessing the gaming site solely for the purpose of purchasing a lottery ticket;		
	b. Every individual who advises the Operator that the individual is participating in a self exclusion process that applies to the site;		
	c. An individual who is known by the Operator to have been restricted from accessing the gaming site or playing a lottery scheme as a condition of a court order;		
	d. Individuals who the Operator has reason to believe have been excluded from the site under subsection 3.6(1) of the GCA;		
	e. Officers, members of the board of directors or partners of the Operator;		
	f. Executives or staff of a trade union who represent or negotiate on behalf of employees employed at the site;		
	g. Employees of registered suppliers who maintain or repair gaming equipment at the site;		
	h. Members or employees of the AGCO;		

No.	AGCO Requirements	Compliance Status	Comments
	i. Officers, members of the board of directors, or employees of OLG or iGaming Ontario, unless they are within the description set out in subsection 22(6) of Ontario Regulation 78/12.		
	2. Individuals described in Requirement 1 above are not eligible for prizes, with the exception of self-excluded individuals.		
*3.02	Games on gaming sites shall be provided only within Ontario, unless they are conducted in conjunction with the government of another province.		
	1. Operators must put in place mechanisms to detect and dynamically monitor the location of a player attempting to play a game and to block unverified attempts to play a game. Player location checks subsequent to the initial location check shall occur at reasonable intervals determined by the Operator that minimize the risk of play outside of Ontario. Depending on the location of the player/device, longer or shorter periods may be justified.		
	2. Operators must put in place mechanisms to detect software, programs, virtualization and other programs capable of circumventing player location detection. Note: If a lottery scheme is being provided in conjunction with another province, individuals in that province may be permitted to be on the gaming site.		
3.03	If the list of prohibited and excluded individuals changes, all registered player information shall be re-verified to ensure that all registered players are still eligible to play, and if they are not eligible, they are prohibited from gaming. The accuracy of the list maintained by the Operator should be periodically reviewed by the Operator.		
	Registration and Account Creation	Out of scope	Pragmatic Play Ltd supplies games. This requirement is the operator's responsibility.
3.04	Relevant player information shall be collected and saved upon registration and shall be demonstrated to be complete, accurate and validated before a player account is created for the player		
	1. Name.		
	2. Date of birth.		
	3. Address.		
	4. Method of identification for subsequent log on, such as user name.		
	5. Player contact information.		

No.	AGCO Requirements	Compliance Status	Comments
	6. Information required by the Proceeds of Crime (Money Laundering) and Terrorist Financing Act and the regulations under it.		
3.05	Before a player account is created, players shall affirm that all player information provided upon registration is complete and accurate.		
	Player Account Maintenance and Transactions	Out of scope	Pragmatic Play Ltd supplies games. This requirement is the operator's responsibility.
3.06	Player information shall be kept complete and accurate.		
3.07	Prior to participating in game play, players must affirm that they are fit for play		
*3.08	All player accounts shall be uniquely identifiable.		
3.09	Players may have only one player account per gaming site		
*3.10	There shall be an auditable trail of events that is logged and available relating to account creation and activation, account deactivation and account changes. 1. Information relating to player identification and verification.		
	2. Information regarding or related to contracts with the player.		
3.11	Players shall acknowledge and accept the terms of the contract governing the player's account and game play prior to account creation and shall acknowledge and accept any subsequent material changes to the terms of the contract when logging in. At all times, the terms of the contract and the operation of the contract must comply with the Standards and Requirements and applicable Ontario laws		
*3.12	All players shall be authenticated prior to accessing their player account and being permitted to gamble. Third parties are not permitted to access a player's account.		
	1. Players must be given the option to use multi-factor authentication when logging in		
*3.13	All player account transactions shall be recorded and logged in an accurate and complete manner.		
*3.14	Player account information shall be made readily available to the player.		
*3.15	All player account transactions shall be made readily available and clear to the player.		

No.	AGCO Requirements	Compliance Status	Comments
	1. Deposit/withdrawal history, and current balance.		
	2. Date and time of previous log in.		
	3. Gaming event and transaction history (game session outcomes and game transactions).		
	4. Method and source of funds used for transactions.		
	5. Total monies wagered for session and/or period of time.		
	6. Total monies won or lost for session and/or period of time.		
	7. Account balance at start and end of session.		
*3.16	All player account transactions shall be uniquely identifiable and traceable to a unique individual player account.		
	Deactivation and Dormant Accounts	Out of scope	Pragmatic Play Ltd supplies games. This requirement is the operator's responsibility.
3.17	Reasonable efforts shall be made to inform players of player funds remaining in dormant accounts.		
3.18	Players may elect to deactivate their player account at any time and, once the election is made, the account is deactivated.		
3.19	Where necessary, a player account may be deactivated by the Operator.		
3.20*	A player account shall be deactivated if requested by the Registrar.		
3.21	If player information is removed, it must be retained in accordance with Standard 1.09 or other records retention requirement that may apply.		
3.22	Where an account becomes dormant or is deactivated by a player or another authorized individual, the player shall be able to recover the balance of their account owing to them.		
4	Ensuring Game Integrity and Player Awareness		
	Game Integrity		
*4.01	All gaming activities and financial transactions shall be conducted fairly and honestly, and must be independently verifiable	Out of scope	Pragmatic Play Ltd supplies games. This requirement is operator's responsibility.

No.	AGCO Requirements	Compliance Status	Comments
	1. Continuous independent monitoring and recording of lottery schemes and cash (and cash equivalent) handling must be in place to support the verification of:		
	a. Adherence to required game rules by players and employees;		
	b. Confirmation of outcomes of lottery schemes;		
	c. Prize payment to the proper person;		
	d. Accuracy of financial transactions.		
	2. Continuous logs shall be maintained for critical gaming systems including to track financial accounting and game state history.		
*4.02	There shall be appropriate, accurate and complete records of transaction and game state and play information kept and made available for the purposes of:	Out of scope	Pragmatic Play Ltd supplies games to operators. This requirement is the operator's responsibility.
	1. Ensuring timely investigations can be performed by the Registrar.		
	2. Capturing information needed to continue a partially complete game within a reasonably defined time.		
	3. Resolving disputes in a fair and timely manner.		
	4. Ensuring player complaints can be resolved.		
	5. Tracking all relevant player information (including funds information).		
	6. Tracking all relevant individual gaming sessions and game play information.		
	7. Tracking all relevant information related to events (including significant events).		
	8. Tracking of game enabling, disabling and configuration changes. Guidance: There should be an adequate amount of storage, capacity and retention of logged information. The appropriate capacity, design and monitoring of the logging facilities should be in place to ensure that logging is not interrupted for a technical reason that could have been prevented.		
*4.03	There shall be a mechanism in place to ensure that if logging is interrupted, compensating manual controls are used, where reasonable.	Out of scope	Pragmatic Play Ltd supplies games to operators. This requirement is the operator's responsibility.

No.	AGCO Requirements	Compliance Status	Comments
*4.04	The gaming system shall be capable of providing custom and on-demand reports to the Registrar. Guidance: the intent is to ensure that the Registrar can receive information in an appropriate format when necessary. Examples are: a list of all games hosted by the website, or a list of all active player accounts.	Out of scope	Pragmatic Play Ltd supplies games to operators. This requirement is the operator's responsibility.
*4.05	Game specifications must be documented that clearly indicate:	Acknowledged	
	1. The objectives of the game;	Compliant	The game rules are displayed to specify the objective of the game.
	2. The wagers that may be made;	Compliant	The bet amount is clearly displayed.
	3. How the game is operated and played;	Compliant	Game rules provided for the game are clear and cover all instructions on how to play.
	4. Odds of winning for each prize available to players;	Compliant	
	5. The advantage of the operator in relation to each wager.	Compliant	The nature of all bets and prizes is clearly indicated.
*4.06	Prior to placing a bet or wager, the player shall be provided with sufficient information to make informed decisions about betting or wagering based on chances of winning, the way the game is played, and prizes and payouts are made.	Acknowledged	
	1. Comprehensive and accurate information that explains the applicable terms governing play must be easily available to the player prior to the placing of a bet or wager through such supports as "game rules", "help" or "how to play" pages placed prominently to allow players to easily locate them. All reasonable steps must be taken to ensure the content is understandable.	Compliant	The game help page with instructions on how to play is available to customers.
	2. The explanatory content shall:	Acknowledged	
	a) indicate the methods of how players may participate in the game and provide instructions and any terms for each of these methods,	Compliant	The game rules provide a description of how the game works.
	b) provide clear instructions on how to interact with the game,	Compliant	The game rules with clear instructions are displayed.
	c) provide clear descriptions of what constitutes a winning outcome,	Compliant	The prize allocation information is provided in the game.
	d) indicate any restrictions on play or betting (e.g., play duration limits, maximum wins),	Compliant	All restrictions on play or betting are explained in the game rules.

No.	AGCO Requirements	Compliance Status	Comments
	e) contain comprehensive, accurate and understandable information on the odds of winning, payout odds, or returns to players,	Compliant	The prize allocation and RTP information are provided in the game.
	f) indicate prize value units (e.g., currency or credits),	Compliant	The winning prize is displayed in currency.
	g) provide any other information on elements that will affect play (e.g., the number of decks or frequency of shuffles in virtual card games) or results (e.g., how progressive jackpots work, number and kind of tokens to be collected to enter a bonus round, the rules and behaviour in a bonus round),	N/A	The game is not linked to any progressive jackpot or bonus round.
	h) contain the same information and be consistent across all languages it is provided in.	Compliant	The game contains the same information and is consistent across all languages.
	3. If certain outcomes, prizes or features are only available under limited circumstances, the explanatory content must clearly indicate what these circumstances are.	N/A	All instructions are provided in the online game rules.
	4. Where speed of interaction has an effect on the player's chances of winning, players must be informed that the speed of connection or processor may have an effect on the game.	N/A	The speed of interaction does not affect the customer's chance of winning.
	5. Where player skill and/or strategy has an impact on the player's chances of winning, players must be informed that their skill and/or strategy will have an impact on their changes of winning.	Compliant	
	6. For all peer-to-peer games, players must be informed of possible communication loss and the impact to the player in such an event.	N/A	The game is not a peer-to-peer game.
	7. The denomination of each credit shall be clearly displayed.	N/A	
	8. The units of displayed prizes and payouts (e.g. denominational units, currency) must be clear.	Compliant	The total prize amount is displayed in currency.
	9. Players shall be provided with information that indicates circumstances in which a game can be declared void.	Compliant	All sufficient information is provided.
*4.07	Information provided to players prior to and during game play shall not mislead players or misrepresent games.	Acknowledged	
	1. Describe any outcomes, prizes, or features that are not achievable.	Compliant	No such outcomes, prizes, and features are defined in the pay-table.
	2. Encourage play as a means of recovering past gambling or other financial losses.	Compliant	No such encouragement was displayed to the player during the loss.

No.	AGCO Requirements	Compliance Status	Comments
	3. Be designed so as to make false promises or present winning as the probable outcome.	Compliant	Game rules did not mislead or give false expectations to a player.
	4. Imply that chances of winning increase:	Acknowledged	
	a. The longer one plays;	Compliant	
	b. The more one spends; or	Compliant	
	c. Suggest that skill can influence the outcome (for games where skill is not a factor);	N/A	
	5. Use language that suggests the probability of a particular outcome is more likely to occur than its actual probability. Examples include the use of the terms, “due”, “overdue”, “ready”, and “ready to hit”.	Compliant	
	6. Mischaracterize the nature of the game by giving it a commonly accepted name, such as “European Roulette”, if the game does not operate as a player would reasonably expect.	Compliant	
*4.08	All games and remote game servers, including any subsequent modifications, must either be approved by the Registrar or certified by an independent testing laboratory registered by the Registrar prior to being provided for any gaming site.	Out of scope	Pragmatic Play Ltd supplies games. This requirement is the operator's responsibility.
*4.09	Gaming systems and gaming supplies shall be provided, installed, configured, maintained, repaired and operated in a way that ensures the integrity, safety and security of the gaming supplies and systems.	Out of scope	Pragmatic Play Ltd supplies games. This requirement is the operator's responsibility.
	1. Only games and remote gaming servers approved by the Registrar or certified by an independent testing laboratory registered by the Registrar shall be used on the gaming site.		
	2. The Registrar shall be immediately notified where there is any problem with the integrity or security of the gaming system or gaming supplies.		
	3. Monitoring and testing shall be performed throughout the life of the gaming system and gaming supplies to ensure they are operating as approved.		
	4. In the event of any suspected integrity or security problem with a gaming system or gaming supply, logs of the current state of the gaming system and gaming supply, and any supportive evidence shall be preserved.		
	5. Operators shall monitor the payback of their live games to detect any behaviour that may indicate faulty performance.		

No.	AGCO Requirements	Compliance Status	Comments
	6. Gaming suppliers shall take immediate action, conduct timely investigations, and make any necessary corrections when there is a problem with the integrity or security of gaming systems.		
4.10*	Where there are suspected game or system faults that may impact game integrity or fairness (e.g., influencing a player's chances of winning or the return to players), Operators shall make the game unavailable to players until the issue has been resolved.	Out of scope	Pragmatic Play Ltd supplies games. This requirement is the operator's responsibility.
*4.11	Production, testing and development systems shall be logically separated.	Out of scope	Pragmatic Play Ltd supplies games and the platform to operators. This requirement is the operator's responsibility.
*4.12	Game outcomes shall be recoverable, where technically possible, so that player bets can be settled appropriately.	N/A	
*4.13	In any case where there is a game or system fault, including where game outcomes are not recoverable, the Operator shall have clearly defined policies and processes in respect of treating the player fairly when resolving the player's transactions. These policies and processes shall be made available to players.	Out of scope	Pragmatic Play Ltd supplies games and the platform to operators. This requirement is the operator's responsibility.
*4.14	Mechanisms shall be in place to allow a game to be recreated up to and including the last communicated state to the player.	Acknowledged	
	1. Selected electronic game elements and game outcomes shall be logged before they are displayed to the player.	Compliant	Game results are displayed in the History.
	2. Information shall be captured that is needed to continue a partially complete game within a reasonable period of time.	N/A	The game will proceed as normal, and any winnings will be processed according to the game result regardless of the disconnection.
*4.15	A player's bet and the outcome of the game shall be clearly displayed, easy to understand, and available for a sufficient length of time for the player to review.	Compliant	The game results are displayed for a reasonable length of time for the customer to see and understand the results.
*4.16	Games shall pay out accurately, completely and within a reasonable time of winning, subject to checks and verifications.	Compliant	Bet and Winning information are displayed clearly and provided for a reasonable period of time.
	Collusion and Cheating	Out of scope	Pragmatic Play Ltd supplies games and the platform to operators. This requirement is the operator's responsibility.
4.17	Operators shall have mechanisms in place to appropriately deter, prevent and detect collusion and cheating.		

No.	AGCO Requirements	Compliance Status	Comments
4.18	All relevant activities related to the detection of collusion and cheating shall be logged.		
4.19	Players shall be provided with clear information on the process to report activities related to collusion and cheating, including the suspected use of bots. The process must be simple to use and readily accessible to a player seeking to make a report.		
	1. Complaints by players about unfair treatment, cheating and collusion must be investigated.		
	2. Information about the Operator's policies and procedures to deter, prevent and detect unfair behaviour, cheating and collusion, including the suspension or disabling of accounts and any recovery of funds, must be made available to the public on request.		
	3. Where an investigation, whether initiated by the Operator or as a result of a player complaint, results in the suspension or disabling of a player account, records of the investigation identifying the activities, the reason for the investigation (including whether it was initiated as the result of a player complaint) and any relevant evidence should be retained in accordance with Standard 1.09.		
	4. The Registrar shall be informed, in accordance with the notification matrix, of any incident that an Operator reasonably believes constitutes an incident of intentional cheating while playing a lottery scheme.		
	Speed and Interruption		
4.20*	Where speed of interaction has an effect on the player's chances of winning, the Operator shall take reasonable steps to ensure the player is not unfairly disadvantaged due to gaming system related performance issues	N/A	Speed of interaction doesn't affect the result of the game.
*4.21	Service interruptions shall be responded to and dealt with in a way that does not disadvantage players.	Out of Scope	Pragmatic Play Ltd supplies games to operators. This requirement is the operator's responsibility.
	1. Inform players that the speed of connection or processor may have, or appear to have, an effect on the game;		
	2. Recover from failures that cause interruptions to the game in a timely fashion;		
	3. Where appropriate, void bets;		
	4. Retain sufficient information to be able to restore events to their pre-failure state, if possible;		

No.	AGCO Requirements	Compliance Status	Comments
	5. Pay players the amount won up to that point, or return bets to players where a game cannot be continued after a service interruption, whichever is the better outcome for the player.		
	Peer-to-Peer Games	N/A	Peer-to-peer gambling is not available
4.22	In peer-to-peer games, Operators must implement measures intended to deter, prevent and detect the use by players of software programs to automatically participate in game play (referred to as a bot) or to provide the player with an unfair advantage over other players.		
	1. Operators must clearly provide notice to players of peer-to-peer games that the use of such software is not permitted and, if a player is found to have used such software, it will be considered to be cheating and the player may be sanctioned by the Operator accordingly		
*4.23	Games must be conducted in a manner that ensures players are treated fairly and not unfairly disadvantaged by other players.		
	1. Measures intended to deter, prevent, and detect unfair behaviour, collusion and cheating, including the suspected use of bots, must be implemented.		
	2. Information regarding specific game elements (such as a player's hand or cards) shall not be accessible to give advantage to any player during games, unless by the player themselves.		
	3. A mechanism shall be in place to ensure that a player cannot play against himself or herself or occupy more than one seat at an individual table.		
	4. Gaming systems must retain a record of relevant activities to facilitate investigation and be capable of suspending or disabling player accounts and player sessions.		
	5. Operators must monitor the effectiveness of their policies and procedures.		
	6. As a minimum deterrent, players must be informed that accounts may be closed if the player has cheated, colluded or acted unfairly towards another player.		
	Determination of Game Outcomes		
*4.24	Games must operate according to their game specifications and the outcomes must be determined in accordance with the terms governing play and prevailing payouts as they are described to the player.	Acknowledged	

No.	AGCO Requirements	Compliance Status	Comments
	1. All possible game outcomes (winning and losing outcomes) shall be available in each play, unless clearly explained to the player.	Compliant	The game results are displayed clearly.
	2. The probability of game outcomes in virtual games shall be the same as in the associated live game (e.g., card games), unless the differences are set out in the terms governing play and communicated to players.	N/A	
	3. The probability of achieving a specific game outcome shall be constant and independent of game history, player or any other factor, unless clearly explained in the terms governing play. Where the game outcome is intended to be random (e.g., dice games or slot games), the outcome must not be dependent or based upon any history or other factors	Compliant	The generation of results is independent of the game.
*4.25	Bets shall be committed before the determination of game outcomes. Any wager received after the determination of game outcomes associated with the wager shall be voided and returned to the player.	Compliant	Bets are not accepted during the game round.
	Randomness of Game Outcomes	Out of scope	The scope is limited to games testing therefore RNG testing is out of scope and tested separately. “652RN-556-PPL-18-01-652”
*4.26	A mechanism shall be in place to randomly select game elements used to determine game outcomes.		
	1. Initial values and conditions shall be selected and used to seed the random selection process in a way that ensures the randomness of the resulting game outcomes and avoids any correlation of selected game elements with elements selected by any other instances of the mechanism.		
	2. The selected game elements and their associated game outcomes shall not be influenced, affected or controlled by the amount wagered, or by the style or method of play unless the conditions are changed and are disclosed clearly to the player.		
	3. The mechanism used to select game elements and their associated game outcomes shall be impervious to outside influences (such as electro-magnetic interference, devices within or external to the gaming system; the characteristics of the communication channel between the system and the end player device, the player or the Operator) and its components shall not be subject to deterioration that impacts, before any scheduled replacement lifecycle, the randomness of selection.		
	4. The selected game elements and their associated game outcomes shall not be altered, discarded or otherwise manipulated through a secondary decision by the game		

No.	AGCO Requirements	Compliance Status	Comments
	program and shall not be impacted by load on the gaming system.		
	5. Any failure by the mechanism to randomly select game elements, including an interruption in the selection process, must be identified and responded to quickly and appropriately to minimize the effect on players.		
*4.27	Mechanisms used to select game elements and their associated game outcome must be capable of being monitored and inspected to ensure the integrity of the mechanisms and its component devices and the randomness of the generated outcomes.		
	Game Management		
*4.28	Terms governing play must not be changed during a game session unless the player is made aware of the change before the player places any wagers in the game.	Acknowledged	
	1. Where applicable, game interface changes made by the player shall be appropriately limited by the gaming system to ensure that information and representation of the game remains fair and accurate and in accordance with the terms governing play.	N/A	A player is not permitted to change the interface.
	2. Information on the current state of multi-state games must be clearly displayed,	N/A	
	3. Displays of jackpot amounts that change over time should be updated as frequently as practicable and particularly after the amount has been reset after a win.	N/A	This game is not linked to Jackpot.
*4.29	Game sessions must be appropriately secured and checked for authenticity.	Out of scope	Operator's responsibility.
*4.30	There shall be a player activity time-out that automatically logs the player out or ends the player's session after a specified period of inactivity.	Compliant	The player session will expire after a specified period of inactivity.
	Downloadable Game Content		
4.31	All critical functions, including the generation of the outcome of any game, shall be generated by the gaming system, independent of the end player device. <i>Guidance: The intent is for the Operator to maintain control (i.e., security, integrity) of all critical game functions.</i>	Out of scope	The generation of game results is independent of the end player device.
5	Public Safety and Protection of Assets	Out of scope	The scope of the evaluation is limited to game design, gameplay, and fairness.

No.	AGCO Requirements	Compliance Status	Comments
			Evaluation of game management / operational procedures and controls is out of scope.
	IT Standards		
*5.01	A recognized industry standard framework shall be used to manage the information technology (IT) control environment to support compliance with the Standards and Requirements.		
	Security Management		
*5.02	Users shall be granted access to the gaming system based on business need.		
	1. Access privileges are granted, modified and revoked based on employment status and job requirements and all activities associated with these actions are logged.		
	2. Access privileges are independently reviewed and confirmed on a periodic basis.		
*5.03	Access to gaming information systems shall be monitored, logged and shall be traceable to a specific individual, either through the assignment of uniquely assigned accounts to individual users or such other reasonable method.		
	1. All system accounts (or other accounts with equivalent privileges) shall be restricted to staff that provide IT support, and mechanisms shall be in place to secure and monitor use of those accounts.		
*5.04	Processes shall be in place to ensure that only authorized individuals are permitted to open system accounts		
*5.05	Industry accepted components, both hardware and software, shall be used where possible.		
*5.06	Any connection or interface between the gaming system and any other system, whether internal or external third party, shall be monitored, hardened and regularly assessed to ensure the integrity and security of the gaming system		
*5.07	Mechanisms shall be in place to ensure the reliability, integrity and availability of the gaming system. 1. Operators shall ensure that a Disaster Recovery site is in place.		
*5.08	There shall be a suitably secure physical environment in place to prevent unauthorized access to the gaming system and to ensure the protection of assets.		

No.	AGCO Requirements	Compliance Status	Comments
*5.09	Gaming systems, infrastructure, data, activity logs and all other related components shall be protected from threats, vulnerabilities, attacks or breaches.		
	1. All users shall be authenticated.		
	2. The appropriateness and effectiveness of steps taken to harden technology components shall be regularly assessed.		
	3. Patches to correct any security risks shall be updated regularly.		
*5.10	Security monitoring activities shall be logged in an auditable manner, monitored, promptly analyzed and a report prepared and escalated as appropriate.		
	1. Attempts to attack, breach or access gaming system components in an unauthorized manner shall be responded to in a timely and appropriate manner.		
	2. Intrusion attempts shall be actively detected and where possible prevented from causing disruption or outage of the gaming system.		
	3. There shall be adequate logging to capture and monitor any attempts to attack, breach or access in an unauthorized manner any components of the gaming system. There shall be an appropriate escalation procedure.		
*5.11	Independent assessments shall be regularly performed by a qualified individual to verify the adequacy of gaming system security and all of its related components.		
*5.12	Operators and gaming related suppliers must inform themselves of the current threats and risks to the security, integrity, and availability of the gaming systems and related components that they operate or supply. Operators must have in place policies and procedures to mitigate such risks and threats. Gaming related suppliers must inform their customers of any material threat or risk to the security or integrity of the gaming systems that they supply or operate.		
	Change Management		
*5.13	A system development lifecycle that considers security and processing integrity shall be in place for gaming system technology developed in-house.		
*5.14	Due diligence must be performed on all acquired gaming system technology to ensure security and processing integrity requirements are met.		

No.	AGCO Requirements	Compliance Status	Comments
*5.15	A testing strategy to address changes in technology shall be in place to ensure that deployed gaming systems operate as intended.		
*5.16	All gaming system changes shall be appropriately, consistently and clearly documented, reviewed, tested and approved.		
	1. All gaming system technology components are installed and maintained in accordance with the appropriate change management procedures.		
	2. Requests for changes and maintenance of the gaming system are standardized and are subject to change management procedures.		
	3. Emergency changes are approved, tested, documented, and monitored.		
	4. Change management procedures shall account for segregation of duties between development and production.		
	5. Only dedicated and specific accounts may be used to make changes.		
5.17	Operators must have both preventative and detective measures in place to ensure that no unauthorized or unintentional changes are made to the gaming system. 1. There must be a mechanism to validate that installed software is the certified software.		
*5.18	Post implementation reviews shall be performed to ensure that changes have been correctly implemented and the outcomes shall be reviewed and approved.		
*5.19	All change related documentation and information shall be captured, stored and managed in a secure and robust manner.		
*5.20	The implementation of software related updates, patches or upgrades shall be regularly monitored, documented, reviewed, tested and managed with appropriate management oversight and approval.		
*5.21	A mechanism shall be in place to regularly monitor, document, review, test and approve upgrades, patches or updates to all gaming-related hardware components as they become end of life, obsolete, shown to have weaknesses or vulnerabilities, are out-dated or have undergone other maintenance.		
*5.22	Appropriate release and configuration management processes with support systems shall be in place to support both software and hardware related changes.		

No.	AGCO Requirements	Compliance Status	Comments
*5.23	Only dedicated and specific accounts may be used to make changes.		
	Data Governance		
*5.24	Data governance shall be in place to address data processing integrity and protection of sensitive data.		
*5.25	Sensitive data, including player information and data relevant to determining game outcomes, shall be secured and protected from unauthorized access or use at all times.		
	1. The gaming system shall ensure that data is appropriately backed up in a manner that allows it to be completely and accurately restored.		
	2. Data backups shall be stored off-site in a secure location and in accordance with applicable policies and laws.		
5.26	Player information shall be securely protected and its usage controlled. 1. Data collection and protection requirements for player personal information shall meet those set out in the Freedom of Information and Protection of Privacy Act.		
	2. Player personal information shall only be used for the lottery schemes conducted and managed respectively by the OLG or iGaming Ontario, unless there is prior approval.		
*5.27	Communication of sensitive game data shall be protected for integrity.		
*5.28	Procedures shall be established and documented for IT operations and incident management, including managing, monitoring and responding to security and processing integrity events.		
	1. Proactive monitoring and detection of errors in the gaming system and related components shall be in place. Action shall be immediately taken to correct incidents of non-compliance with the Standards and Requirements or control activities.		
	2. There shall be time synchronization of the gaming system environment and related components.		
	3. Event data shall be retained to provide chronological information and logs to enable the reconstruction, review and examination of the time sequences of processing.		
	Architecture and Infrastructure		
*5.29	The gaming system architecture and all its related components shall demonstrate security in depth.		

No.	AGCO Requirements	Compliance Status	Comments
*5.30	All gaming systems and devices shall validate inputs before inputs are processed.		
*5.31	The gaming system shall only display the minimum information about the gaming system to unauthorized users and during system malfunctions to minimize the risk of compromising the gaming system or the privacy of information.		
*5.32	All remote access methods shall be appropriately secured and managed.		
*5.33	Use of wireless communication shall be secured and only used where appropriate. <i>Guidance: The intent is to ensure that wireless communication is not present in areas where it could be potentially harmful (e.g. data centres).</i>		
*5.34	All components shall be hardened as defined by industry and technology good practices prior to going live and as part of any changes.		
	1. All default or standard configuration parameters shall be removed from all components where a security risk is presented		
*5.35	Access shall be appropriately restricted to ensure that the domain name server records are kept secure from malicious and unauthorized changes.		
	Data and Information Management		
*5.36	All private encryption keys shall be stored on secure and redundant media that are only accessible by authorized management personnel.		
*5.37	Encryption algorithms and key lengths shall be regularly assessed for security vulnerabilities.		
*5.38	The gaming system architecture shall limit the loss of data and session information.		
	System Account Management		
*5.39	The gaming system shall be able to change, block, deactivate or remove system accounts in a timely manner upon termination, change of role or responsibility, suspension or unauthorized usage of an account.		
*5.40	A secure authenticator that meets industry good practices shall be used to identify users and their accounts to ensure that only authorized individuals are permitted to access their system account on the gaming system.		

No.	AGCO Requirements	Compliance Status	Comments
	1. The gaming system shall automatically lock out accounts where any identification and authorization requirement is not met after a defined number of attempts.		
	2. Multi-factor authentication shall be implemented as part of a secure authenticator.		
*5.41	The gaming system shall ensure that all access to the system is fully attributable to, and logged against, a unique user identification.		
*5.42	Only the minimum access rights shall be granted to each system account on the gaming system and access rights shall be clearly documented.		
*5.43	All temporary and guest accounts shall be disabled immediately after the purpose for which the account was established is no longer required.		
*5.44	System accounts and system access rights for the gaming system shall be regularly reviewed and updated.		
*5.45	A log of account owners shall be kept and regularly reviewed and updated.		
*5.46	A mechanism shall be in place to ensure that the assignment of administrator accounts is approved by the Operator's management and that usage is monitored for appropriateness.		
*5.47	Inappropriate use of system accounts on the gaming system shall be logged, reviewed and responded to within a reasonable period of time.		
*5.48	Inappropriate use of administrator accounts shall be reported to the Registrar in accordance with the notification matrix		
	Software		
	Note: The following Standards apply to the following types of software:		
	1) Modified commercial off-the shelf software,		
	2) Proprietary developed software, and		
	3) Software specifically developed by the OLG or iGaming Ontario.		
*5.49	Software used for the gaming system shall be developed using industry good practices.		

No.	AGCO Requirements	Compliance Status	Comments
*5.50	Software development methodologies used shall be clearly documented, regularly updated and stored in an accessible, secure and robust manner.		
*5.51	An appropriate system shall be in place to manage the software development and ongoing software management lifecycle.		
*5.52	All software development roles shall be segregated during and after release of code to a production environment.		
*5.53	An appropriate audit trail of authority and management review of code for software shall be established.		
*5.54	Controls shall be in place to ensure software is appropriately secured and access is appropriately restricted throughout development.		
5.55	Authorized management staff shall review and approve software documentation to ensure that it is appropriately and clearly documented.		
*5.56	Source code and compiled code shall be securely stored. <i>Guidance: Compiled code could be digitally signed or hashed (including each time there is a change) in a manner that allows for external verification.</i>		
*5.57	The promotion or movement of code from testing through other environments to production shall be accompanied by the appropriate documentation and approvals.		
*5.58	All promotion of code from development to production shall only be performed by production support staff and not by development staff.		
*5.59	Appropriate testing environments shall be in place to allow for thorough testing of any code before it is put into production.		
*5.60	Access to production environments shall be restricted from development personnel. Note: This does not preclude granting of temporary supervised access for conducting technical investigations that may only be performed on the production environment.		
*5.61	Development code shall not be present in the production environment.		
*5.62	A mechanism shall be in place to verify the integrity of the software that is deployed to production, including before changes are implemented, as well as on an ongoing basis.		
*5.63	Appropriate release and configuration management systems shall be in place to support software development.		

No.	AGCO Requirements	Compliance Status	Comments
*5.64	All code developed by a third party shall be tested to ensure it meets industry good practices and that it performs to meet its purpose prior to being added to the testing environment and prior to integration testing.		
*5.65	All code developed by a third party shall pass integration testing before it is added to production.		
*5.67	Quality assurance processes, including testing, shall take place during development and prior to the release of any code.		
*5.68	All components, where appropriate, shall be tested for the purposes for which they will be used.		
	Funds Management Deposits		
5.69	<p>Players may be permitted to deposit funds into their player accounts only after the appropriate verifications and authorization deposits shall be verified and authorized to ensure the following</p> <ol style="list-style-type: none"> 1. Deposits made are appropriately authorized by a financial services provider. <p>Note: Cryptocurrency is not legal tender and shall not be accepted</p>		
	Withdrawals		
5.70*	Players are permitted to withdraw funds from their player account only after the appropriate verifications and authorization.		
	1. Withdrawals shall be verified and authorized to ensure the following, before a withdrawal is permitted:		
	a. The withdrawal is being made by a holder of the account; and		
	b. The withdrawal is being transferred to an account of which the player is a legal holder		
5.71	Players are permitted to withdraw funds from their player account in an accurate and complete fashion and as soon as is practicable, subject to appropriate authorization and verification		
	Funds Maintenance and Transactions		
5.72	Funds Maintenance and Transactions		
5.73	All player funds deposited in respect of igaming lottery schemes conducted and managed by the OLG shall be held in an OLG account. iGaming Ontario shall take steps to ensure that all player funds deposited in respect of igaming lottery schemes		

No.	AGCO Requirements	Compliance Status	Comments
	conducted and managed by iGaming Ontario are subject to oversight by iGaming Ontario and available to players.		
5.74	Operators shall not extend credit or lend money to players or refer players to credit providers or imply or infer that a player should seek additional credit to play games.		
5.75	No player's account is permitted to have a negative funds balance. A player's account with a negative funds balance must be suspended and no transactions permitted after the negative funds balance arises. No transaction is permitted until the negative funds balance is eliminated.		
*5.76	1. The player balance shall be displayed in Canadian dollars.		
5.77	Players shall be provided with unambiguous information about all player account fees prior to making a withdrawal or deposit.		
5.78	Players shall be informed clearly and specifically of all rules and restrictions regarding deposits and withdrawals and access to funds in connection with deposits and withdrawals.		
5.79	Funds shall not be transferred between player accounts.		
5.80*	Adjustments to player accounts shall be made accurately and only by authorized individuals.		
*5.81	Adjustments to player accounts shall be recorded and logged in an accurate and complete manner.		
5.82	Players shall be provided with accurate, clear and specific reasons for any adjustments made to their accounts		
6	Minimizing Unlawful Activity Related to Gaming	Out of scope	Evaluation of game management / operational procedures and controls is out of scope.
6.01	Mechanisms shall be in place to reasonably identify and prevent unlawful activities at the gaming site the Operator shall:		
	1. Conduct periodic risk assessments to determine the potential for unlawful activities, including money laundering, fraud, theft and cheat at play.		
	2. Ensure that all relevant individuals involved in the operation, supervision or monitoring of the gaming site shall remain current in the identification of techniques or methods that may be used for the commission of crimes at the gaming site.		
	3. Appropriately monitor player and employee transactions, including the ongoing analysis of incident reports and suspicious transactions for possible unlawful activity.		

No.	AGCO Requirements	Compliance Status	Comments
	4. Report suspicious behaviour, cheating at play and unlawful activities in accordance with the established notification matrix.		
6.02	Anti-money laundering policies and procedures to support obligations under the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) shall be implemented and enforced.		
	1. Copies of all reports filed with FINTRAC and supporting records shall be made available to the Registrar in accordance with the established notification matrix.		
	2. Operators shall ensure their anti-money laundering internal controls align with those of the designated reporting entity under the PCMLTFA.		
6.03	Reasonable measures shall be in place to identify and prevent suspected money laundering activities in the gaming site the Operator shall:		
	1. Implement policies, procedures and controls that specify times and situations, based on the assessment of risk, where the Operator will ascertain and reasonably corroborate a player's source of funds.		
	2. Implement risk-based policies and procedures that provide for escalating measures to deal with players who engage in behaviour that is consistent with money laundering indicators, including the refusal of transactions or exclusion of the player.		
	3. Ensure that mechanisms are in place to share information, in a lawful manner, about high risk or suspicious activities with other Operators which may also be subject to similar activity.		

1.2 Return to Player

The statistical return to player (RTP%) and *Actual RTP% for the below games of Pragmatic Play Ltd are:

S.NO	Game Name	Game Type	Channels	Version	Theoretical RTP	Actual RTP	Simulation of games run
1.	Spaceman	Other Game	Desktop and Mobile	1.60.22	95.50%	95.50%	100 million

*A game simulator was run to simulate the game rounds and results were collected and processed to calculate the Actual RTP% of the game.

References

- 1 *Registrar's Standards for Internet Gaming.*
- 2 *"652RN-556-PPL-18-01-652.pdf", no version. date April 16, 2019.*
- 3 *Maths's spreadsheet "Spaceman_math.xls", no version, no date.*
- 4 *Game Description"Spaceman Game Design", no version, no date.*

Annex A: Hashes of Critical Components

Game Name	Critical Component	SHA-1
Spaceman	SpaceManRNGObject.class	d060b63b5707666ce67386eb89e95c311bfa2ebf
	SpacemanSecondLevelRngConfiguration	868735fd0446e6f561c41aaa9328d1cfcc8bf23d
	SpacemanFirstLevelRngConfiguration	8db017e2163384ef1a8aefceacbb72f4af5f8bc3
	ResultCodeVO.class	f7ff44c528a4c6f22a90e936cc299c497045d6b3
	BetCodeVO.class	1e0c535c5357f06538b84b936aa34670d86bb931

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