



eCOGRA LIMITED
KANSSPELAUTORITEIT
NETHERLANDS ONLINE GAMBLING SYSTEM

CONFORMITY ASSESSMENT REPORT
GAME OR GAMING TECHNOLOGY (INCLUDING RNG)

FOR

ALCHEMYBET LTD

REPORT REFERENCE NUMBER: E235585GRLNLDM

REPORT ISSUE DATE: 12 MAY 2023

CONFIDENTIAL

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TABLE OF CONTENTS

1. General Information	4
2. Gaming technology Assessment Work– Qualifications and Experience.....	6
2.1. Assessment Supervisors.....	6
2.2. Assessors.....	6
3. Overview of Online Gaming System Components Assessed	7
3.1. Game or gaming technology (including RNG).....	7
3.2. Game Overview	7
3.3. Percentage Return to Player ('RTP')	7
3.4. Game Critical Software Components.....	8
3.5. Random Number Generator	9
4. Key Documents Reviewed	9
5. Assessment and Evaluation Methods Applied.....	10
5.1. Games and Gaming Technology	10
6. Detailed Assessment Results	11

1. GENERAL INFORMATION

CLIENT NAME:	AlchemyBet Ltd
CLIENT ADDRESS:	Two Valentine Place, London SE1 8QH, United Kingdom
CLIENT CONTACT PERSON:	Alli Archer
CLIENT E-MAIL ADDRESS:	alli@gamingrealms.com
PRODUCT NAME:	Slingo Money Train
UNIFORM RESOURCE LOCATORS: (WEBSITE ADDRESS)	Not applicable, this report relates to the assessment of a supplier to license holders.
ASSESSMENT BODY FULL NAME:	eCOGRA Limited t/a eCOGRA
ASSESSMENT BODY LEGAL FORM:	Private Company
ASSESSMENT BODY MANAGING ADDRESS:	46 Upper Mount Street, Dublin 2, D02 RX88, Ireland
ASSESSMENT BODY ACCREDITATIONS HELD:	eCOGRA are a UKAS accredited testing laboratory, certification body and inspection body No. 4656. Our accreditations are limited to those activities described on our UKAS schedules of accreditation found here https://ecogra.org/about-us/accreditations .
ASSESSMENT BODY CONTACT PERSON:	Bradley Khoury
ASSESSMENT BODY CONTACT EMAIL:	info@ecogra.org
ASSESSMENT SCOPE:	Game or gaming technology (including RNG)
ASSESSMENT STANDARDS AND CRITERIA:	Kansspelautoriteit (Ksa) Remote Gambling – Gaming System Assessment Scheme (Version 2.0)
REPORT TYPE:	Conformity Assessment Report
REPORT REFERENCE NUMBER:	e235585GRLNLDM
REPORT ISSUE DATE:	12 May 2023

DATES OF ASSESSMENT:

24 April 2023 - 12 May 2023

PLACE OF TESTING:

Pre-Production Environment emulating the Live Environment,
where applicable.

ASSESSMENT RESULT:

Compliant

ASSESSMENT BODY REPORT APPROVAL:

A handwritten signature in black ink, appearing to be 'BK' or similar initials, written in a cursive style.

Bradley Khoury
Chief Technical Officer
eCOGRA

2. GAMING TECHNOLOGY ASSESSMENT WORK– QUALIFICATIONS AND EXPERIENCE

2.1. ASSESSMENT SUPERVISORS

Name:	Tyrone Rajah
Education/Qualification:	Bachelor of Science
Date Obtained:	2014
Number of Years' Experience in Testing and Inspection of Online Gaming Systems:	2 Years

Name:	Temesgen Zewotir
Education/Qualification:	PhD in Statistics
Date Obtained:	28 November 2001
Other Relevant Qualifications:	MSc in Statistics, BSc in Mathematics
Date Obtained:	1991, 1987
Number of Years' Experience in Testing and Inspection of Online Gaming Systems:	From 2016 to date

2.2. ASSESSORS

Name:	Thabang Maganedisa
Position:	Team Lead
Name:	Sumeshan Padayachee; Collin Zondi
Position:	Compliance Tester
Name:	Stephen Coombe
Position:	Data Analyst

3. OVERVIEW OF ONLINE GAMING SYSTEM COMPONENTS ASSESSED

3.1. GAME OR GAMING TECHNOLOGY (INCLUDING RNG)

Please note that this is an initial certification conducted over Slingo Money Train and therefore this game certificate does not supersede any previous certifications.

3.2. GAME OVERVIEW

Game Name	Game ID	Version	Platform	Game Type
Slingo Money Train	slingo-moneytrain	1.0.0	HTML5-Desktop; HTML5-Mobile	Other

Game Description:

The aim of Slingo Money Train is to complete Slingos (win lines) by matching the numbers on the reel to the numbers in the grid above. Each Slingo completed awards a prize as defined by a payable.

Players have 10 spins to complete Slingos and can then purchase up to 40 extra spins for an additional cost that is determined by the potential wins available. Prizes are awarded for reaching the 3rd rung of the prize ladder or above, either as a cash prize, a multiplier award from a Bonus Wheel or by playing the feature game.

Slingo Money Train uses a 5x5 grid, with 12 possible Slingos (lines). Like most other Slingo games, there is a reel beneath the grid.

Further details regarding the betting characteristics, features and detailed game rules can be found in the game instructions which can be provided upon request.

This certification report highlights our key findings as a result of the evaluation conducted on the following channels:

- Desktop Channel - Windows 11 Pro, Google Chrome Browser, Version 112.0.5615.49 (Official Build) (64-bit)
- Mobile Channel - Samsung A8, Android 11; SM-X205 Build/RP1A.200720.012 Google Chrome Browser Version 103.0.5060.129

3.3. PERCENTAGE RETURN TO PLAYER ('RTP')

Theoretical RTP %	eCOGRA RTP % Recalculation
Base Game: 94.42%	Base Game: 95.66%
Purchase Spins: 94.47%	Purchase Spins: 94.74%

The theoretical RTP percentage indicated in the table above is extracted from the game documentation as provided by the supplier. eCOGRA recalculated the RTP percentage by performing additional independent mathematical calculations on the output of simulation game data.

3.4. GAME CRITICAL SOFTWARE COMPONENTS

The following critical software elements formed part of the assessment scope:

Software Element Name	Version Date	Version Number	Digital Signature (SHA#1 Hash)
ChanceEngine.class	N/A	1.5.0	F13C9090CCC0FAA67602EEA89FB44EAAD4A52C1A
chance-moneytrain-10-config.yml	N/A	1.5.0	35A09FD920AC26EEB47B06F4724C179505E27F29
chance-moneytrain-12-config.yml	N/A	1.5.0	41970821AAC7A20DA6CE56ACA5EB0C6BF2059B3C
chance-moneytrain-4-config.yml	N/A	1.5.0	CFF8828442F45CFDA8E26B9367B0139EF48ACF7F
chance-moneytrain-5-config.yml	N/A	1.5.0	3B764FEB1B0A1BFB37BEFD1B82B37D90AD50AF53
chance-moneytrain-6-config.yml	N/A	1.5.0	4AC22B5CCB0E8849F51B3E7A8C0CE513282F4985
chance-moneytrain-7-config.yml	N/A	1.5.0	7E7821EF0D9F75C9C896B9E7011188B292B98BC1
chance-moneytrain-8-config.yml	N/A	1.5.0	753D6030CA9D3A3670AE85A0E37999313E54E82C
chance-moneytrain-9-config.yml	N/A	1.5.0	C178CC5C9A6260781E5439DDBB39BB80D73E5C4C
chance-moneytrain-bronze-config.yml	N/A	1.5.0	51A0C40198B39019EA59FA5C2F12BBE3912E97C0
chance-moneytrain-gold-config.yml	N/A	1.5.0	272B4BFEA400655704E6B4DB19F5BD34B8DA59AA
chance-moneytrain-silver-config.yml	N/A	1.5.0	008FE92DF5F79F933DA6AA936015063B7DCD2D81
chance-moneytrain-slots-config.yml	N/A	1.5.0	4E96B2008F5EA25B040E9D53577EE9EFCC56B1E4
SlingoEngine.class	N/A	1.5.0	E8F4516E8A9C1656E8884E3716077E85CCA7738F
SlotsMoneyTrainEngine.class	N/A	1.5.0	E7F81103F3581E81822B2BA6FDD881A1C08DD52F
SlotsMoneyTrainRNGService.class	N/A	1.5.0	ABD7EC3B8D7E6EAA3F52E792CEC325DD835BE117
slots-moneytrain-config.yml	N/A	1.5.0	C10C183853F1903A067851B60EC7B20C813ACA7A
slingo-moneytrain-config.yml	N/A	1.5.0	7D4A49A25D93B578BAC532A25C8CB9898DCCC2DD
SlotsEngine.class	N/A	1.5.0	E1EB3F614653434CEDC32E164B6EB42D1DAD41B7
slingo-moneytrain-prices.csv.gz	N/A	1.5.0	A89C2C1292A2FE961B93F28720B21BAC809858DB

3.5. RANDOM NUMBER GENERATOR

The RNG utilised in evaluating the game output and games rules has been sufficiently and appropriately tested under a separate RNG testing report. Please refer to RNG report RN-563-GR1-20-02-609 issued by GLI Europe B.V. on 14 July 2021 for further details of testing conducted over RNG

4. KEY DOCUMENTS REVIEWED

Key Documents Inspected			
File Name	Type	Version Number	Version Date
moneytrain_help_nl_NL	Game Rules	1.0.0	N/A
Slingo Money Train Maths - PAR V2.5	Parsheet	2.5	N/A
rgs-game-info-slingo-moneytrain	Specification Doc	1.1	10/03/2023

5. ASSESSMENT AND EVALUATION METHODS APPLIED

The sections below provide a high-level overview of the assessment and evaluation methods applied.

5.1. GAMES AND GAMING TECHNOLOGY

Game design assessment has included verification of the game mathematics, game artwork, the theoretical RTP and player-facing game rules. Software assessment has included evaluation and verification of the software implementation of the game design aspects tested, with verification procedures conducted over games rules and the actual RTP, using methods of simulation, emulation and manual testing, and verification of the scaling and mapping used to convert raw RNG output to game outcomes.

Game Assessments	
Game Software Assessment	Verification procedures over sufficiency and appropriateness of the client's internal testing conducted over the game under certification.
Documentation Assessment	Evaluation of the supporting game documentation to ensure that it is consistent and supports the game rules and logic present in the game.
Source Code Assessment	Evaluation of the pertinent modules of the game source code for mapping of rules and RNG calling.
Mathematical Assessment	Review of the mapping of the random inputs to game outcomes in accordance with prevailing probabilities and pay tables. Review of the game design and game mathematics that determine the theoretical RTP%. Independent mathematical calculations of RTP% utilising complete, accurate and valid simulated game data output, to verify the theoretical RTP% as per the game mathematics documentation. Game simulation (output) assessment to ensure the game outcomes are randomly generated and the actual RTP is within an acceptable range of the expected RTP.
Playability Assessment	Inspection of game interface including artwork and graphics, and clear and correct presentation of the game rules. Evaluation of game accounting in accordance with game pay tables.
Functionality Assessment	Comprehensive operational and functional client-side tests over the game mechanics to ensure that game pay tables, game rules and help files are correctly implemented in the operation of the game. A check on whether it is possible to place a wager outside of the base game and ordinary course of play, and if this wager directly activates a game feature outside of the ordinary course of play.
Emulation Assessment	Assessment of rare outcomes through emulation to ensure that game pay outs, top prizes and jackpot features (if applicable) operate correctly.

Further documentation assessments, game functionality assessments and game artwork and game rule review assessments were conducted to verify that the game conformed to relevant certifiable requirements.

6. DETAILED ASSESSMENT RESULTS

Assessments were performed against certifiable sections of the following laws and regulations of Kansspelautoriteit, as applicable to the components relevant to the products within scope:

- Remote Gambling – Gaming System Assessment Scheme (Version 2.0)

The results of our assessment for conformity with the relevant requirements are detailed below. Different values used in the “Assessment Result” column is described as follows:

- **Compliant:** The components within the assessment scope conform to the assessment standards and criteria.
- **Not Applicable:** The requirement is not applicable for the assessment of conformance. Refer to comments for further information.
- **Out of Scope:** The requirement for the assessment of conformance cannot be evaluated at this stage due to the current scope of assessment. Refer to comments for further information.
- **Non-Compliant:** Non-compliance with the regulatory requirement has been identified. Refer to comments for further information.
- **Compliant with Observation:** The components within the assessment scope conform to the assessment standards and criteria with certain limitations or an area of moderate risk of potential non-compliance identified. Refer to comments for further information.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
3.2 Payment transactions						
12 - Section number Decree: B4.31.2	ID NL: KS.02.10_2.0	<p>Confirm that the design ensures that the licensee provides the player with access to the necessary information relating to their gambling account and the changes to the gambling account on each page or screen of the player interface. This information shall in any case include:</p> <ul style="list-style-type: none"> a. the current balance of the gambling account; b. the opening balance of the gambling account at the most recent login; c. the total stake since the most recent login; d. the total profits and the total losses since the most recent login, and e. an overview of all transactions on the gambling account for a period of at least the last 90 days. 		Playability Assessment	Compliant	<p>We participated in multiple game rounds and inspected the game interface, game rules and pay tables. We confirmed that the player's account balance is continuously displayed on all pages related to the game.</p> <p>Requirements are not managed by the game supplier. The scope of assessment is limited to aspects directly managed by the supplier.</p>
3.9 Gambling technology						

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
56 - Regulations number Decree: R3.4.1	ID NL: KS.09.03_2.0	In terms of design, establish that the licence holder only uses names for the games on offer that match the types of game actually being played (poker, roulette, betting, etc.).		Playability Assessment	Compliant	We inspected the game interface, game rules and pay tables, and confirmed that the game name displayed on all pages does not give the player the impression that this is a different game type other than a Slingo game. Furthermore, the game rules state this is a slingo game.
58 - Regulations number Decree: R3.7	ID NL: KS.09.05_2.0	In terms of design and implementation, establish that devices cannot automatically begin taking part in betting or gambling activities without the input of the player.		Functionality Assessment	Compliant	We accessed the game and confirmed that a game round does not automatically initiate, the player is required to initiate the game round by clicking the 'Spin' button. We further inspected the game interface, game rules and pay tables, and confirmed that there is no auto-play functionality available.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
		In terms of design and implementation, establish that a player will not begin participating in a game until they press a real or virtual button to confirm their stake.		Functionality Assessment	Compliant	We participated in multiple game rounds, wagering all possible bet amounts, and confirmed that the player is not forced into betting or gambling activities, the player is required to initiate the game round by clicking the 'Spin' button.
		In terms of design and implementation, confirm that games against the licensee do not include any form of automatic stakes.		Functionality Assessment	Compliant	We accessed the game and inspected the game interface, game rules and pay tables. We confirmed that there is no auto-play functionality available.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
		In terms of design and implementation, establish that the so-called auto-play functionality can only be used after the start of a game where another player is played at the same time.		Functionality Assessment	Not Applicable	We inspected the game interface, game rules and paytables, and confirmed that there is no auto-play functionality available in the game. Furthermore, the game under certification is not a multi- player game.
59 - Regulations number Decree: R3.9	ID NL: KS.09.06_2.0	In terms of design, establish that the auto-play function operates in accordance with the rules of the game, as communicated to the player. At the very least, establish that the fairness of the function and the timeliness of choices are addressed.		Functionality Assessment	Not Applicable	We inspected the game interface, game rules and paytables, and confirmed that there is no auto-play functionality available in the game.
		In terms of design, establish that a player cannot simply stake money on something by using the auto-play function, unless this is necessary for the progress of the game, in accordance with rules that must be easily understood by the players (e.g. blinds in a game of poker).		Functionality Assessment	Compliant	We inspected the game interface, game rules and paytables, and confirmed that there is no auto-play functionality available in the game.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
60 - Regulations number Decree: R3.9a	ID NL: KS.09.07_2.0	In terms of design and implementation, establish that the gaming system has been set up in such a way that fair play is guaranteed at all times in live casino games, by way of the following technical requirements: a. The player is able to take part in those casino games via a direct video link.		Playability & Functionality Assessment	Not applicable	The game under certification is not a live casino game.
		In terms of design and implementation, establish that the gaming system has been set up in such a way that fair play is guaranteed at all times in live casino games, by way of the following technical requirements: b. The direct video link and, where applicable, other communication connections and means of communication: i. have been sufficiently protected against malfunctions; ii. are protected against unlawful access, unauthorised use and manipulation;		Not applicable	Not applicable	The game under certification is not a live casino game.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
		In terms of design and implementation, establish that the gaming system has been set up in such a way that fair play is guaranteed at all times in live casino games, by way of the following technical requirements: c. the progress of the live casino games and the gambling behaviour of players is analysed and recorded on the basis of video surveillance and video reporting;		Not applicable	Not applicable	The game under certification is not a live casino game.
		In terms of design and implementation, establish that the gaming system has been set up in such a way that fair play is guaranteed at all times in live casino games, by way of the following technical requirements: d. the analysis and recording, as referred to under c., shall in any case be aimed at identifying and countering fraud and abuse, as well as risks of gambling addition;		Not applicable	Not applicable	The game under certification is not a live casino game.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
		<p>In terms of design and implementation, establish that the gaming system has been set up in such a way that fair play is guaranteed at all times in live casino games, by way of the following technical requirements:</p> <p>e. Only personnel who have the requisite qualifications and have received training either internally or externally or have attended a training course shall be used to organise the live casino games.</p>		Not applicable	Not applicable	The game under certification is not a live casino game.

<p>61 - Regulations number Decree: R3.3</p>	<p>ID NL: KS.09.08_2.0</p>	<p>In terms of design and implementation, establish that the gaming system allows the player to finish a game interrupted by malfunctions.</p>	<p>Not applicable</p>	<p>Functionality Assessment</p>	<p>Compliant</p>	<p>We simulated a loss in connection during game play and inspected the game interface. We confirmed that the game produces a message informing the player of no internet connection, and on return to the game we confirmed that the player is presented with a message informing them of the incomplete game. The game continues after a player has pressed the 'ok' button. Furthermore, we refreshed the browser during game play and inspected the game interface on return to the game. We confirmed that the player is presented with a message informing them of the incomplete game. The game continues after a</p>
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Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
						player has pressed the 'ok' button.

		<p>In terms of design and implementation, establish that the gaming system provides information to the player about the status of a game interrupted by malfunctions.</p>		<p>Playability & Functionality Assessment</p>	<p>Compliant</p>	<p>We simulated a loss in connection during game play and inspected the game interface. We confirmed that the game produces a message informing the player of no internet connection, and on return to the game we confirmed that the player is presented with a message informing them of the incomplete game. The account balance is correct and unchanged from the point where the connection was lost. The game round continues after a player has pressed the 'ok' button. Furthermore, we refreshed the browser during game play and inspected the game interface on return to the game. We confirmed that the</p>
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Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
						player is presented with a message informing them of the incomplete game. The account balance is correct and unchanged from the point where the browser was refreshed. The game continues after a player has pressed the 'ok' button.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
62 - Regulations number Decree: R3.5	ID NL: KS.09.09_2.0	In terms of design and implementation, establish that, before play commences, the gaming system provides the player with information about the possible bets and the bets selected by the player.		Playability Assessment	Compliant	We inspected the game interface before play commences and noted the current stake is available on the game interface, the player accesses the Stake options by selecting the stake. All possible stakes levels are available in the Stake options section. Once the player selects their stake, the stakes is clearly displayed at the bottom of the game interface before initiating a game round.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
		In terms of design and implementation, establish that the player provides the value of their stake in money (a currency) before the game starts.		Playability Assessment	Compliant	We inspected the game interface before play commences and noted the current stake is available on the game interface and is displayed in Euro's, the player accesses the Stake options by selecting the stake. All possible stakes levels are available in the Stake options section, and it is clear they are in Euro's. Once the player selects their stake, the stakes is clearly displayed on the game interface in Euro's before initiating a game round.

<p>63 - Remote Gambling Decree and Regulations: B4.2.3 and R3.2.1</p>	<p>ID NL: KS.09.10_2.0</p>	<p>In terms of design and implementation, establish that, with the exception of the actual betting and the actual payment of the prizes, the practice games are the same as the gambling activities offered by the licence holder.</p>	<p>SlotsMoneyTrainRNGService.class 1.5.0 SlotsMoneyTrainEngine.class 1.5.0 slots-moneytrain-config.yml 1.5.0 SlotsEngine.class 1.5.0 slingo-moneytrain-prices.csv.gz 1.5.0 slingo-moneytrain-config.yml 1.5.0 SlingoEngine.class 1.5.0 chance-moneytrain-slots-config.yml 1.5.0 chance-moneytrain-silver-config.yml 1.5.0 chance-moneytrain-gold-config.yml 1.5.0 chance-moneytrain-bronze-config.yml 1.5.0 chance-moneytrain-12-config.yml 1.5.0 chance-moneytrain-10-config.yml 1.5.0 chance-moneytrain-9-config.yml 1.5.0 chance-moneytrain-8-config.yml 1.5.0</p>	<p>Playability & Functionality Assessment & Source Code Assessment</p>	<p>Compliant</p>	<p>The scope of assessment is limited to aspects directly managed by the supplier.</p>
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Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
			chance-moneytrain-7-config.yml 1.5.0 chance-moneytrain-6-config.yml 1.5.0 chance-moneytrain-5-config.yml 1.5.0 chance-moneytrain-4-config.yml 1.5.0 ChanceEngine.class 1.5.0			
64 - Regulations number Decree: R3.2a.1	ID NL: KS.09.11_2.0	In terms of design and implementation, establish that the Random Number Generator applied is suitable for the form of gambling for which the Random Number Generator is used.	Not applicable	Refer to Method stated in RNG report.	Not applicable	The scope of this assessment is limited to newly introduced component or components that have undergone changes.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
65 - Regulations number Decree: R3.2a.3	ID NL: KS.09.12_2.0	In terms of design and implementation, establish that, for casino games, each Random Number Generator, with a data set of at least 1,000,000 outcomes, successfully passes one of the below tests: <ul style="list-style-type: none"> • the DIEHARD Test (Marsaglia); • the NIST (National Institute of Standards and Technology) or TESTU01. For mechanical random number generators such as roulette kettles, it is possible to limit the dataset to a minimum of 1000 times the possible outcomes.		Refer to Method stated in RNG report.	Not applicable	The scope of this assessment is limited to newly introduced component or components that have undergone changes.
66 - Regulations number Decree: R3.2.1	ID NL: KS.09.13_2.0	In terms of design and implementation, establish that each Random Number Generator is equipped with a suitable method of seeding and re-seeding so that predictability of results is avoided.		Refer to Method stated in RNG report.	Not applicable	The scope of this assessment is limited to newly introduced component or components that have undergone changes.
67 - Regulations number Decree: R3.2.1	ID NL: KS.09.14_2.0	In terms of design and implementation, establish that, except for the randomness of other players, the outcome of all chance parts of the gambling activities are based on the Random Number Generator. Exception: when using a randomness mechanism without replacement, the outcome of the random parts can be predictable to a certain extent.		Refer to Method stated in RNG report.	Not applicable	The scope of this assessment is limited to newly introduced component or components that have undergone changes.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
68 - Regulations number Decree: R3.2.1	ID NL: KS.09.15_2.0	In terms of design and implementation, establish that each outcome of the Random Number Generator, and the result it has led to in the gambling, is recorded.		Refer to Method stated in RNG report.	Not applicable	The scope of this assessment is limited to newly introduced component or components that have undergone changes.
69 - Regulations number Decree: R3.2.1	ID NL: KS.09.16_2.0	In terms of design and implementation, establish that the outcome of any game is determined solely by chance and the choice or choices made by the player within the framework of the game.		Refer to Method stated in RNG report.	Not applicable	The scope of this assessment is limited to newly introduced component or components that have undergone changes.
70 - Regulations number Decree: R3.2.1	ID NL: KS.09.17_2.0	In terms of design and implementation, establish that the gambling can function in the same way, independently of the means used by the players.		Functionality Assessment	Compliant	We inspected the game on HTML5 Desktop and Mobile and confirmed on mobile devices with smaller screens that the buttons are moved from the bottom to the right of the game interface. We confirmed that the functionality is the same on both devices.

<p>71 - Regulations number Decree: R3.2.1</p>	<p>ID NL: KS.09.18_2.0</p>	<p>In terms of design and implementation, establish that the odds of winning or losing expected by the player correspond to the odds generated and presented by the gambling activities.</p>	<p>SlotsMoneyTrainRNGService.class 1.5.0 SlotsMoneyTrainEngine.class 1.5.0 slots-moneytrain-config.yml 1.5.0 SlotsEngine.class 1.5.0 slingo-moneytrain-prices.csv.gz 1.5.0 slingo-moneytrain-config.yml 1.5.0 SlingoEngine.class 1.5.0 chance-moneytrain-slots-config.yml 1.5.0 chance-moneytrain-silver-config.yml 1.5.0 chance-moneytrain-gold-config.yml 1.5.0 chance-moneytrain-bronze-config.yml 1.5.0 chance-moneytrain-12-config.yml 1.5.0 chance-moneytrain-10-config.yml 1.5.0 chance-moneytrain-9-config.yml 1.5.0 chance-moneytrain-8-config.yml 1.5.0</p>	<p>Documentation Assessment & Source Code Assessment & Playability Assessment</p>	<p>Compliant</p>	
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Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
			chance-moneytrain-7-config.yml 1.5.0 chance-moneytrain-6-config.yml 1.5.0 chance-moneytrain-5-config.yml 1.5.0 chance-moneytrain-4-config.yml 1.5.0 ChanceEngine.class 1.5.0 Slingo Money Train Maths - PAR V2.5			
72 - Regulations number Decree: R3.2.1	ID NL: KS.09.19_2.0	In terms of design and implementation, establish that, where present, the jackpot is linked to a game outcome of the gambling activities and that the jackpot is part of the prize schedule of the gambling activities.		Source Code Assessment & Functionality Assessment & Emulation Assessment	Not Applicable	This game does not contain a progressive jackpot.

<p>73 - Regulations number Decree: R3.3</p>	<p>ID NL: KS.09.20_2.0</p>	<p>In terms of design and implementation, establish that the pay-out rate presented is the theoretical pay-out rate.</p>	<p>SlotsMoneyTrainRNGService.class 1.5.0 SlotsMoneyTrainEngine.class 1.5.0 slots-moneytrain-config.yml 1.5.0 SlotsEngine.class 1.5.0 slingo-moneytrain-prices.csv.gz 1.5.0 slingo-moneytrain-config.yml 1.5.0 SlingoEngine.class 1.5.0 chance-moneytrain-slots-config.yml 1.5.0 chance-moneytrain-silver-config.yml 1.5.0 chance-moneytrain-gold-config.yml 1.5.0 chance-moneytrain-bronze-config.yml 1.5.0 chance-moneytrain-12-config.yml 1.5.0 chance-moneytrain-10-config.yml 1.5.0 chance-moneytrain-9-config.yml 1.5.0 chance-moneytrain-8-config.yml 1.5.0</p>	<p>Mathematical Assessment</p>	<p>Compliant</p>	<p>We inspected the math's par sheet and game specification document, and verify that the pay line assessment, payout distribution and theoretical payout rate are in line with the documents provided.</p>
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Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
			chance-moneytrain-7-config.yml 1.5.0 chance-moneytrain-6-config.yml 1.5.0 chance-moneytrain-5-config.yml 1.5.0 chance-moneytrain-4-config.yml 1.5.0 ChanceEngine.class 1.5.0 Slingo Money Train Maths - PAR V2.5 rgs-game-info-slingo-moneytrain 1.0.0			
77 - Regulations number Decree: R3.2.2	ID NL: KS.09.24_2.0	In terms of design and implementation, establish that, in player-to-player gambling activities, the participants are registered per game.		Functionality Assessment	Not Applicable	The game under certification is not a multi- player game
78 - Regulations number Decree: R3.3	ID NL: KS.09.25_2.0	In terms of design and implementation, establish that any deviations in a mechanical Random Number Generator are recorded.		Refer to Method stated in RNG report.	Not Applicable	A Mechanical RNG is not used.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
79 - Regulations number Decree: R3.8	ID NL: KS.09.26_2.0	In terms of design and implementation, establish that the gaming system will accept the player's bet and participation only if the outcome of the immediately preceding game is certain.		Functionality Assessment	Compliant	We inspected the game interface during game play and confirmed that once a player initiates a game round, the stake options and 'Spin' button is disabled. A player is unable to change or add to the current stake until the current game round is complete, the account balance is correctly updated, and the game history functionality provides a record that game play is concluded.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
		In terms of design and implementation, establish that the gaming system gives the player sufficient opportunity to influence the further course of the game.		Functionality Assessment	Compliant	We inspected the game interface during game play and confirmed that before a player initiates a game round, a player is given sufficient opportunity to influence the further course of the game, there is no time limit to participate in a game round and a game round will not initiate until a player clicks the 'Spin' button.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
80 - Remote Gambling Decree and Regulations: B4.34 and R3.4	ID NL: KS.09.27_2.0	In terms of design and implementation, establish that the rules of the game and the pay-out percentage presented for the game do not change during the game.		Playability & Functionality Assessment	Compliant	We participated in multiple game rounds, including any game features, as well as inspected the game rules and paytables before, during and after game play. We confirmed that there is only one version of game rules and paytables for this game and it does not change and is consistent. Furthermore, we inspected the math's par sheet and XML, and confirmed that the pay-out percentage displayed in the game is consistent with the math's par sheet and XML.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
81 - Remote Gambling Decree and Regulations: B4.34 and R3.4	ID NL: KS.09.28_2.0	In terms of design and implementation, establish that each game is provided with as comprehensive an explanation of the game as possible, including instructions on how to play.		Playability & Functionality Assessment	Compliant	We inspected the game rules/pay tables and confirmed that they cover all aspects of the game and are clearly communicated.
82 - Remote Gambling Decree and Regulations: B4.34 and R3.4	ID NL: KS.09.29_2.0	In terms of design and implementation, establish that the game explanations and related instructions do not give rise to deception or misunderstanding.		Playability & Functionality Assessment	Compliant	We inspected the game rules and pay tables, we participated in multiple game rounds, including any game features and compared this to the game rules and paytables. After our comparison, we confirmed that the game rules are clear and in accordance with the game functionality.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
83 - Remote Gambling Decree and Regulations: B4.34 and R3.4	ID NL: KS.09.30_2.0	In terms of design and implementation, establish that the game explanations and related instructions are displayed using the tool used by the player for the gambling.		Playability Assessment	Compliant	We accessed the game on HTML5 Desktop and Mobile and inspected the game rules and pay tables. The game rules and paytables were accessed via a burger icon found on the game interface and we confirmed that they are available on the same HTML5 Desktop and Mobile device as the actual game.
84 - Remote Gambling Decree and Regulations: B4.34, B4.38 and R3.4	ID NL: KS.09.31_2.0	In terms of design and implementation, establish that the game explanations and accompanying instructions are in any case drawn up in the Dutch language.	moneytrain_help_nl_NL1.0.0	Playability Assessment	Compliant	We inspected the game interface, game rules, pay tables and game rule documents. We confirmed with the use of a translator tool and image text extractor that all information is displayed in the Dutch.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
85 - Remote Gambling Decree and Regulations: B4.34, B4.38 and R3.4	ID NL: KS.09.32_2.0	In terms of design and implementation, establish that the game explanations and corresponding instructions are set to Dutch by default.	moneytrain_help_nl_NL1.0.0	Playability Assessment	Compliant	The scope of assessment is limited to aspects directly managed by the supplier.
86 - Remote Gambling Decree and Regulations: B4.34 and R3.4	ID NL: KS.09.33_2.0	In terms of design and implementation, establish that the available game explanations and related instructions are the same in all languages.	moneytrain_help_nl_NL1.0.0	Playability Assessment	Compliant	We inspected the game interface, game rules, pay tables, Dutch and English and game rule documents. With the use of a translator tool we compared the information and confirmed that all information is the same in all languages.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
87 - Remote Gambling Decree and Regulations: B4.34 and R3.4	ID NL: KS.09.34_2.0	In terms of design and implementation, establish that game explanations and related instructions are available before the player places their bet.		Playability & Functionality Assessment	Compliant	We accessed the game and inspected the game rules and pay tables before initiating a game round. We confirmed that the game rules and paytables are available before a game round is initiated by the player and they remain available throughout game play.
88 - Remote Gambling Decree and Regulations: B4.34 and R3.4	ID NL: KS.09.36_2.0	In terms of design and implementation, establish that game explanations and corresponding instructions are also available during the game.		Playability & Functionality Assessment	Compliant	We participated in multiple game rounds and features and inspected the game rules and pay tables. We confirmed that they are available during game rounds.
89 - Remote Gambling Decree and Regulations:	ID NL: KS.09.37_2.0	In terms of design and implementation, establish that the game explanations and accompanying instructions contain information on the theoretical pay-out rate of the gambling activities.		Playability Assessment	Compliant	We inspected the game rules and pay tables and confirmed that the theoretical pay-out rate is clearly displayed.

Section No.	Theme / Article	Requirement Assessed	Document/s Used	Method	Assessment Result	Comments
B4.34 and R3.4		In terms of design and implementation, establish that, where applicable, the pay-out percentage is displayed for different game strategies of the player.		Playability Assessment	Not applicable	We inspected the game rules and confirmed that only one RTP payout percentage is displayed. The game being certified is a single player slingo game and does not contain elements of skill, the player is able to select their stake from the stake section found by clicking on the stake displayed on the game interface, once a player has selected their stake the stake section is minimized, and the player is able to click the spin button to initiate the game round.