



eGAMING COMPLIANCE SERVICES LIMITED

SPELINSPEKTIONEN TESTING AND INSPECTION REPORT

FOR

ALCHEMYBET LTD

REPORT REFERENCE NUMBER: E216072GRLSWEM

REPORT ISSUE DATE: 03 AUGUST 2021

SLINGO BIG WHEEL, 1.5.3, HTML5-DESKTOP; HTML5-MOBILE

CONFIDENTIAL

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1. GENERAL INFORMATION

CLIENT NAME:	AlchemyBet Ltd
CLIENT ADDRESS:	Two Valentine Place, London SE1 8QH, United Kingdom
LICENSES HELD:	Not applicable
PLATFORM SUPPLIERS:	Not applicable
GAME SUPPLIERS:	Not applicable, this report relates to the assessment of a game for the supplier
UNIFORM RESOURCE LOCATORS: (WEBSITE ADDRESS)	Not applicable, this report relates to the assessment of a game
ACCREDITED BODY FULL NAME:	eGaming Compliance Services Limited t/a eCOGRA
ACCREDITED BODY LEGAL FORM:	Private Company
ACCREDITED BODY MANAGING ADDRESS:	2nd Floor Berkeley Square House, Berkeley Square, London, W1J 6BD, United Kingdom
ACCREDITED BODY ACCREDITATIONS HELD:	<p>An Accredited Testing Laboratory No. 4656. ISO/IEC 17025:2017 (Great Britain, Denmark, Sweden and Switzerland), Issued By The United Kingdom Accreditation Service (Issue No:022, Issue Date: 16 June 2021).</p> <p>An Accredited Inspection Body No. 4656. ISO/IEC 17020:2012 (Sweden and Switzerland), Issued By The United Kingdom Accreditation Service (Issue: 008, Issue Date: 16 June 2021).</p> <p>An Accredited Certification Body No. 4656. ISO/IEC 17021-1:2015, Issued By The United Kingdom Accreditation Service (Issue: 008, Issue Date: 16 June 2021).</p>
ACCREDITED BODY EXPERIENCE	18 Years' Testing And Inspection Of Online Gambling Systems; 5 Years' Auditing and Certifying Information Security Management Systems, 6 Years' Experience Of Risk And Vulnerability Analyses.
ACCREDITED BODY REPRESENTATIVE:	Ansonette Rees

ACCREDITED BODY CONTACT EMAIL: tex@ecogra.org

ACCREDITED BODY CONTACT NUMBER: Tel: +44 20 7887 1480

ASSESSMENT SCOPE: Core game assessment of Slingo Big Wheel, 1.5.3, HTML5-Desktop; HTML5-Mobile

ASSESSMENT STANDARDS AND CRITERIA: Relevant Assessable Requirements Contained In 2018:1138 Gambling Act; 2018:1475 Gambling Regulations; LIFS 2018-2 Regulations and general advice about responsible gaming; LIFS 2018-5 Regulations and general advice about commercial online games and betting; and LIFS 2018-8 Regulations and general advice on technical requirements and accreditation of bodies for anyone who is to check, test and certify gaming activities.

REPORT TYPE: Testing and Inspection Report

REPORT REFERENCE NUMBER: e216072GRLSWEM

REPORT ISSUE DATE: 03 August 2021

DATE OF TESTING AND INSPECTION: 21 July 2021 - 02 August 2021

PLACE OF TESTING: Pre-Production Environment Emulating The Live Environment, Where Applicable.

SUPPLIER REPRESENTATIVE: Alli Archer (Games Delivery Manager)

ASSESSMENT RESULT: Compliant

ACCREDITED BODY REPORT APPROVAL:

A handwritten signature in black ink, appearing to read "Gary Lupton-Smith".

Gary Lupton-Smith
Technical Services Manager
eCOGRA

2. TESTING AND INSPECTION WORK – QUALIFICATIONS AND EXPERIENCE

2.1. Testing and Inspection Supervisors

Name:	Gary Lupton-Smith
Education/Qualification:	Bachelor of Commerce
Date Obtained:	1991
Other Relevant Qualifications:	Certified Information Systems Auditor (CISA)
Date Obtained:	2000
Number of Years' Experience in Testing and Inspection of Online Gaming Systems:	14 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. Testing and Inspection Assessors

Name:	Adent Ngobeni
Position:	Teamledare
Name:	Takalani Nenzhelele; Ethic Hadebe
Position:	Games Testers
Name:	Tyrone Rajah; Jaqueline Krishen
Position:	Data Analyst

3. GAME DETAILS

3.1. Game Overview

Game Name	Version	Platform	Game Type
Slingo Big Wheel	1.5.3	HTML5-Desktop; HTML5-Mobile	Online Game Casino, (Other)

Game Description: Slingo Big Wheel is the fast paced bingo game with big prizes. Win a spin on increasingly valuable wheels by completing slingos. Select your stake and press start game to begin.

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 10, Google Chrome Browser Version 92.0.4515.107 (Official Build) (64-bit)
- Mobile Channel - iPad mini IOS Version 13.6 Google Chrome Version 84,0,4147,122

3.2. Percentage Return to Player ('RTP')

Theoretical RTP %	eCOGRA RTP % Recalculation
Base RTP: 95.58% Extra Spins RTP: 95.22%	Base RTP: 95.67% Extra Spins RTP: 95.04%

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.

4. SOFTWARE COMPONENTS WITHIN ASSESSMENT SCOPE

4.1. Core Game Tests and Software Elements

The core game evaluation included the following tests, amongst others:

- Review of game documentation;
- Review of the mapping of the random inputs to game outcomes in accordance with prevailing probabilities and pay tables;
- Evaluation of the pertinent modules of the game source code for mapping of rules and RNG calling;
- Evaluation of game accounting in accordance with game pay tables;
- Inspection of game interface including artwork and graphics, and clear and correct presentation of the game rules;
- 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;
- Testing of rare outcomes through emulation to ensure that game pay outs, top prizes and jackpot features (if applicable) operate correctly;
- 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; and
- Game simulation (output) testing to ensure the game outcomes are randomly generated; and the actual RTP is within an acceptable range of the expected RTP.

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

Software Element Name	Version Date	Version Number	Digital Signature (SHA#1 Hash)
bigwheel-1.0.0.jar	N/A	N/A	fb2f082f0167a7ad99297751d01e2600b7eaff06
bigwheel-1.0.0-sources.jar	N/A	N/A	88e418f2411f4675039a745bc61c3c1a8782ea2d
BigWheelConfig.java	N/A	N/A	b8ad08917769e7716996b763405ea8383f62ff71
GameEngine.java	N/A	N/A	bfbf48bdd126e147b34fbe9aa1913e8d548d8150
PriceManager.java	N/A	N/A	949bf0973ab88383839383a29c234b6e91ffcb42

4.2. 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 208-19-003-SE-SGA-02 issued by GLI on 17 July 2019 for further details of testing conducted over RNG. The following critical software elements formed part of the RNG assessment scope:

Software Element Name	Version Date	Version Number	Digital Signature (SHA#1 Hash)
RNG.class	N/A	N/A	24b872ccac8d36c4d5694cc5d523e8b0e19846b3
SecureRNG.class	N/A	N/A	c051b2292f000afcc6cc782d581ba6507b83817d

5. ASSESSMENT RESULTS

Testing and inspection procedures were performed against certifiable sections of the following laws and regulations of Spelinspektion, as applicable to the components relevant to the products within scope:

- Spellag (SFS2018:1138)
- Spelförordning (SFS2018:1475)
- Föreskrifter och allmänna råd om spelansvar (LIFS 2018:2)
- Föreskrifter om undantag från kravet på registrering (LIFS 2018:3)
- Föreskrifter och allmänna råd om vadhållning och onlinespel (LIFS 2018:5)
- Tekniska föreskrifter och allmänna råd om ackreditering av organ för den som ska kontrollera, prova och certifiera spelverksamhet (LIFS 2018:8)

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 testing/inspection or limitation of the test/inspection environment. Refer to comments for further information.
- **Non-Compliant:** The components within the assessment scope do not conform to the assessment standards and criteria. Refer to comments for further information.
- **Observation:** Attention of the Regulator: Due to varying interpretations between Accredited Entities, it is put forward to the Regulator for a decision on the status of compliance.

Table summarising compliance with the assessment standards and criteria:

The results of our assessment for conformity with the core game relevant requirements are detailed below.

5.1. SFS 2018:1138 Gambling Act

SFS 2018:1138 Gambling Act			
Requirement No.	Requirement Assessed	Assessment Result	Comments
13	Gambling Accounts		
13.5	A license holder may receive payments for a gaming account only from a paid service supplier according to the law (2010:751) on payment services.	Out of scope	The scope of assessment is limited to aspects directly managed by the supplier.
13.6	Money, gaming tokens, or similar may not be transferred between gaming accounts.	Out of scope	The scope of assessment is limited to aspects directly managed by the supplier.
13.7	The funds that a player has in a gaming account must be kept separate from the license holder's own funds. The license holder must at the latest with the opening of a gaming account inform the player on how the funds in the gaming account are protected if the license holder should experience financial difficulties.	Out of scope	The scope of assessment is limited to aspects directly managed by the supplier.
13.8	When a gaming account is closed, the license holder must as soon as possible payout the balance in the gaming account to the player. The license holder must, however, pay back what remains of the deposits that the player has made, if the gaming account is closed due to 1. the player opening a temporary gaming account having given false information on him or herself or, upon challenge by the license holder, did not provide documentation that verifies the information that was given at registration, or 2. the player was shut out of the game due to misconduct.	Out of scope	The scope of assessment is limited to aspects directly managed by the supplier.
14	Gaming Liability		
	Age Limit		
14.3	Gaming must be conducted in a manner that makes it possible to control the age of a player. The age limit for a game must clearly be indicated at the locations where the game is provided.	Out of scope	The scope of assessment is limited to aspects directly managed by the supplier.

SFS 2018:1138 Gambling Act			
Requirement No.	Requirement Assessed	Assessment Result	Comments
	Information Obligation		
14.4	A license holder must keep all relevant information on the game, including the possibilities of profit and rules, easily available to players and authorities. This information must be in Swedish.	Out of scope	The scope of assessment is limited to aspects directly managed by the supplier.
	Game Design		
14.5	It is not permitted to especially design or program games so that the player has the impression to be close to winning when that is not the case. A license holder may not provide free games, test games, and similar games that have a different random result than corresponding games with wagers.	Compliant	
	Wagers and certain limits		
14.6	In a game the player must actively indicate and confirm his or her wager.	Compliant	
14.7	In online games the player must give an upper limit for his or her wagers. With play on token gaming machines according to section 5 of §§ 7 and 8 a loss limit should be indicated instead.	Out of scope	The scope of assessment is limited to aspects directly managed by the supplier.
	Credit prohibition		
14.8	It is not permitted for a license holder or a gaming agent to offer or give credit for wagers in the game. The gaming authority may for a given lottery allow an exception to the prohibition in the first item, if 1. the lottery is conducted under license according to section 6, 2. the credit concerns the purchase of lots for a given time, and 3. the total amount of credit amounts to at most 1/40 of the price base amount.	Compliant	

5.2. SFS 2018:1475 Gambling Regulations

SFS 2018:1475 Gambling Regulations			
Requirement No.	Requirement Assessed	Assessment Result	Comments
6	Betting		
	Other provisions		
6.4	Betting shall be provided with fixed or running odds or a combination of these.	Not Applicable	Not applicable for this game type.
10	Gaming Accounts		
10.1	An amount that is paid in by a player to a gaming account shall be credited to the account when the license holder has received the amount. Winnings shall be immediately credited or as fast as it can occur with respect to safety in the transaction.	Out of scope	The scope of assessment is limited to aspects directly managed by the supplier.

5.3. SFS 2018:2 Regulations and general advice about responsible gaming

SFS 2018:2 Regulations and general advice about responsible gaming			
Requirement No.	Requirement Assessed	Assessment Result	Comments
	Information about winnings, losses and log in time		

SFS 2018:2 Regulations and general advice about responsible gaming			
Requirement No.	Requirement Assessed	Assessment Result	Comments
13	With online gaming under chapters 7 and 8 of the Gaming Act (2018:1138) the player shall receive regular, clear and varying messages about winnings and losses and information about how long the player has been logged in. The messages under the first paragraph shall be displayed as often and for as long a time as necessary to prevent excessive gaming. Thereafter, the message shall be confirmed by the player and the player, in combination with the confirmation, shall be given the possibility to choose to either terminate or continue their play.	Compliant	
17	When playing on-line under chapters 6–8 of the Gaming Act (2018:1138) there shall be logotypes that link to a self-test, limitation of stakes (gaming budget) and specification of login time and exclusion from gaming. The logotypes provided by the Gaming Agency and shall be placed in a locked field uppermost on all the license holder's web sites, mobile web pages, applications and similar.	Out of scope	The scope of assessment is limited to aspects directly managed by the supplier.
	Stakes		
18	Stakes shall be given in Swedish crowns.	Compliant	
	Design of a game		
19	A game may not give an impression that the player, through their own settings or selections can affect their chances of winning if the chance of winning depends entirely on random chance.	Compliant	
20	If the license holder offers selections that affect the outcome of the game, a message shall be displayed to the player for at least three seconds before an automatic selection is made.	Compliant	

5.4. SFS 2018:5 Regulations and general advice about commercial online games and betting

SFS 2018:5 Regulations and general advice about commercial online games and betting			
Requirement No.	Requirement Assessed	Assessment Result	Comments
	Information for players		
7	<p>In addition to that specified in Chapter 14, § 4 of the Gambling Act (2018:1138) the following information shall be kept readily available to players where a licence holder offers gambling:</p> <ol style="list-style-type: none">1. the name, corporate identity number, telephone number and email address of the licence holder;2. licensed period;3. the risks that may be associated with games for money;4. contact information for an independent helpline regarding gambling problem that can provide help in accordance with Swedish conditions;5. that the Swedish Gambling Authority is the licensing and supervisory authority;6. the wager or equivalent for the game in question; and7. any other costs for participating in the game in question;	Not Applicable	The scope of assessment is limited to aspects directly managed by the supplier.
	Special terms on poker		
10	<p>All logged-in players shall be able to spectate all live poker games.</p> <p>However, the first paragraph does not apply to poker games that require specific registration. In such cases, only those players who have specifically registered for that game shall be able to spectate it.</p>	Not Applicable	Not applicable for this game type.

5.5. SFS 2018:8 Regulations and general advice on technical requirements and accreditation of bodies for inspection, testing and certification of gambling service providers

SFS 2018:8 Regulations and general advice on technical requirements and accreditation of bodies for inspection, testing and certification of gambling service providers			
Requirement No.	Requirement Assessed	Assessment Result	Comments
7	Functions for the license holder's game administration		
	Interrupted games		
7.3	It must be possible to finish playing an interrupted game, unless otherwise specified in the rules of the game. An interrupted game must be shown to the player, along with any bets made, once the gambling system is reconnected. Bets referred to in the second paragraph must be kept separate and be separately reported in the player's player account until the game is finished.	Compliant	
9	Functional requirements for the licence holder in relation to the players		
	Player account		
9.9	A player must be able to see their balance in the player account immediately after each completed transaction. There must be a function to show the player which games they have participated in, all the bets made, and all the winnings paid out in accordance with Chapter 13, Section 3, first paragraph of the Gambling Act (2018:1138).	Compliant	
	Initiated game		
9.16	During gambling, there must be a function and documented procedures to prevent the placing of a bet once the time set by the licence holder for lot-drawing or an event which will yield a future result has begun.	Compliant	
10	Payout percentage		
10.1	For games with progressive winnings, the minimum payout percentage must be indicated to the player.	Compliant	

SFS 2018:8 Regulations and general advice on technical requirements and accreditation of bodies for inspection, testing and certification of gambling service providers			
Requirement No.	Requirement Assessed	Assessment Result	Comments
11	Game instructions, payout table and pot		
	Game instructions		
11.1	Game instructions must be complete, unambiguous and non-deceptive.	Compliant	
11.2	Game instructions and rules must be available without placing a bet.	Compliant	
11.3	Game instructions must be available through the same type of medium as the game. Game instructions must be easily accessible.	Compliant	
	Payout table		
11.4	There must be documented quality assurance procedures to ensure that the configuration of payout tables is correct. There must be documented procedures to ensure that the calculations of payout tables are correct.	Compliant	
	Pot		
11.5	There must be rules for how a player can win a pot. It must be clearly stated how the pot is financed and distributed.	Not Applicable	The provisions of Sections 5 –7 fall under the Swedish Gambling Authority’s supervisory responsibilities and are not subject to accredited testing and inspection.
11.6	It must be clear from the rules how a pot will be divided if there is more than one winner.	Not Applicable	The provisions of Sections 5 –7 fall under the Swedish Gambling Authority’s supervisory responsibilities and are not subject to accredited testing and inspection.
11.7	It must be clear from the rules how a licence holder can cancel or terminate a pot.	Not Applicable	The provisions of Sections 5 –7 fall under the Swedish Gambling Authority’s supervisory responsibilities and are not subject to accredited testing and inspection.
13	Functional requirements for random number generators		

SFS 2018:8 Regulations and general advice on technical requirements and accreditation of bodies for inspection, testing and certification of gambling service providers			
Requirement No.	Requirement Assessed	Assessment Result	Comments
13.1	The results from a random number generator must be random, statistically independent, have a correct standard deviation and correct probability distribution. The results yielded by the random number generator must not be predictable without knowledge of the applied algorithm, implementation and initial values.	Compliant	
13.2	There must be a documented reference to a well-established algorithm and any source code as well as to the recalculation procedure of the random number generator. If the random number generator is built in to the software, it must be possible to present the entire source code, along with comments and documentation.	Compliant	Refer to RNG report: 208-19-003-SE-SGA-02
13.3	The random number generator must be able to withstand the set maximum load.	Compliant	Refer to RNG report: 208-19-003-SE-SGA-02
13.4	Functions that do not generate outcomes in games but which depend on random elements must be based on the results of the random number generator.	Not Applicable	Refer to RNG report: 208-19-003-SE-SGA-02
13.5	Calculations based on a random number generator must have a correct standard deviation and correct probability distribution. The numbers, symbols or events resulting from the random number generator must correspond with the rules set for the game involved.	Compliant	Refer to RNG report: 208-19-003-SE-SGA-02
13.6	The calculations of the random number generator must correspond to the events registered in the gambling system.	Compliant	Refer to RNG report: 208-19-003-SE-SGA-02

SFS 2018:8 Regulations and general advice on technical requirements and accreditation of bodies for inspection, testing and certification of gambling service providers			
Requirement No.	Requirement Assessed	Assessment Result	Comments
13.7	If the rules of the game requires a sequence from a random number generator to be set in advance, it is only allowed to generate new sequences if this is stated in the rules.	Not Applicable	Refer to RNG report: 208-19-003-SE-SGA-02
13.8	Unless otherwise specified in the rules of the game, the results from a random number generate must always be independent of events in the current or previous games.	Not Applicable	Refer to RNG report: 208-19-003-SE-SGA-02
Drawing equipment without a random number generator			
13.9	The results from drawing equipment without a random number generator must be random, statistically independent, have a correct standard deviation and correct probability distribution.	Not Applicable	This requirement applies to live dealer games that use drawing equipment without a random number generator.
13.10	Independent drawing equipment without a random number generator must be kept locked in with limited access.	Not Applicable	This requirement applies to live dealer games that use drawing equipment without a random number generator.
Drawing equipment for live casino games			
13.11	Drawing equipment used in live casino games must be monitored and recorded. The recorded material must show compliance with the rules of the game. The recording must register date and time.	Not Applicable	This requirement applies to live dealer games only.
13.12	There must be physical access control for the premises used for live casino games and any associated areas. There must separate access control, at least for different employee categories.	Not Applicable	This requirement applies to live dealer games only.
15	Functional requirements for online games		
	Game design		

SFS 2018:8 Regulations and general advice on technical requirements and accreditation of bodies for inspection, testing and certification of gambling service providers			
Requirement No.	Requirement Assessed	Assessment Result	Comments
15.1	Games with interactive options must have illustrations that clearly show current and possible bets. Games in accordance with the first paragraph must clearly illustrate the possibility of changing or resetting the current bet.	Compliant	
15.2	Each round must last for at least three seconds. The first paragraph also applies to autoplay functions.	Compliant	
15.3	A player's participation in a game, and the choices made by the player in the gambling system, must be optional. A player must be given a reasonable period of time to consider the consequences of a choice. Repeated choices made by a player in the gambling system must not be able to be placed in a queue.	Compliant	
	Visual presentation		
15.4	The name of the game must be displayed on all pages associated with that particular game.	Compliant	
15.5	The gambling system must have a function that continuously shows the player how long they have been logged in.	Compliant	
15.6	The gambling system must have a function that continuously shows the player their balance throughout the session.	Compliant	
15.7	The bet on a game must be clearly displayed. The player's possible and actual bets, as well as the minimum and maximum bets, must be clearly displayed. The gambling system must have a function that clearly visualises the player's bet, including the total bets in the game.	Compliant	

SFS 2018:8 Regulations and general advice on technical requirements and accreditation of bodies for inspection, testing and certification of gambling service providers			
Requirement No.	Requirement Assessed	Assessment Result	Comments
15.8	A player must be informed that there are factors beyond their control, which may affect the game and its outcome.	Not Applicable	Not applicable for this game type.
15.9	The outcome of a game must remain visible for a reasonable period of time.	Compliant	
15.10	Computer-simulated gambling machines must clearly indicate or illustrate which symbols represent a win. If different combinations of symbols lead to a win, these must be clearly indicated or illustrated.	Compliant	
15.11	If the characteristics of a game change temporarily the game must clearly indicate the current status before the next game.	Compliant	
15.12	A symbol that is used in a gambling system must have the same shape and colour throughout that particular game.	Compliant	
15.13	The number of active decks as well as which cards are included in a particular game must be clearly indicated. The front of the card must clearly show its suit and rank. The rules of the game must clearly state when the cards will be shuffled.	Not Applicable	Not applicable for this game type.
15.14	If a non-traditional die is used in a dice game, this must be made clear to the player. It must be clearly indicated which side of a die wins a game.	Not Applicable	Not applicable for this game type.
15.15	A gambling system must have a function to prevent players playing against themselves. A gambling system must have a function to discover and prevent one or more players using the same gambling equipment at the same time.	Not Applicable	Not applicable for this game type.
15.16	The current pot amount must be visible to all participating players.	Not Applicable	There is no progressive jackpot in this game.
15.17	A player must immediately be informed of winning the pot. Once a pot has been won, all players must be informed of its new value.	Not Applicable	There is no progressive jackpot in this game.

SFS 2018:8 Regulations and general advice on technical requirements and accreditation of bodies for inspection, testing and certification of gambling service providers			
Requirement No.	Requirement Assessed	Assessment Result	Comments
	Information pursuant to the second paragraph must also be available to players who have not participated in the specified pot.		
15.18	It must be clearly stated if a pot is not available to a player. It must be ensured that all information given to the players is correct, regardless of whether or not a pot is available.	Not Applicable	There is no progressive jackpot in this game.